

Public Involvement Plan

New Mexico Environment Department Air Quality Bureau, Planning Section

Project: Annual Report for San Juan Generating Station for the $2010\ SO_2$

Data Requirements Rule

Planning Timeframe: May – June 2018

Project Planner: Cindy Hollenberg

Approval:

Elizabeth Bisbey-Kuchn, Chief, Air Quality Bureau

Purpose

The New Mexico Environment Department (NMED) developed this Public Involvement Plan (Plan) to provide public participation opportunities and information that may be needed to participate in the inspection of the required annual report for the San Juan Generating Station, pursuant to the 2010 SO₂ Data Requirements Rule. The Air Quality Bureau (Bureau) encourages public participation in regulatory and other planning opportunities, and has developed this Plan to increase transparency regarding the planning and decision-making processes. This Plan integrates information about potentially affected communities and identifies resources provided by the Bureau to successfully incorporate community participation activities into the decision-making process. The Plan identifies the NMED staff and resources needed to accomplish these activities.

In developing this Plan, community participation needs were assessed to ensure appropriate promotion of public outreach by identifying whether there is a combination of environmental and demographic factors (i.e., low income community, minority community, limited English proficiency individuals, linguistically isolated households, etc.) that may impact public participation needs. This assessment identifies community outreach needs, provides for public access opportunities beyond statutory requirements, and supports the provision of adequate public access to information about the annual report on SO₂ emissions at the San Juan Generating Station.

EPA requires that the annual report of SO₂ emissions at the San Juan Generating Station be "available for public inspection." The Bureau will follow this Plan, specifically designed to ensure nondiscriminatory access to this public participation opportunity related to federal rule requirements.

Details about planned Bureau outreach are provided in this Plan.

Project Overview

Pursuant to the Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS), air agencies are required to submit an annual report to their respective EPA Regional Administrator for areas which demonstrated attainment for the 2010 SO₂ NAAQS by modeling of actual emissions. This report shall document the annual SO₂ emissions of each applicable source and provide an assessment of the cause of any emissions increase from the previous year. The first report is due by July 1 of the calendar year after the effective date of the area's initial designation.

All areas of New Mexico have been designated attainment/unclassifiable through three rounds of designations by the U.S. Environmental Protection Agency (EPA). As part of the round 3 designation process, the 2015 Data Requirements Rule stipulated that, for areas surrounding sources emitting 2,000 tons per year (TPY) or more of sulfur dioxide, states must characterize air quality in one of three ways: (1) ambient air monitoring; (2) modeling of either actual or allowable emissions; or (3) demonstration of enforceable emissions limitations below the 2,000 TPY threshold.

In New Mexico, the only source emitting above the 2,000 TPY threshold was the San Juan Generating Station (SJGS). This source, working with the Air Quality Bureau, decided to characterize that area's air quality by modeling actual emissions. Modeling submitted to EPA in January 2017 demonstrated that this area met the 2010 SO₂ Primary NAAQS, using quality-assured data from the SJGS' continuous emissions monitoring system (CEMS) for the years 2013 - 2015. EPA designated this area and all of San Juan County as attainment/unclassifiable in December 2017.

Public Involvement Plan Annual Report - SJGS Version: May 2018 Page 2

This Project is moderately important to the Department and the affected communities. The annual report is a federal requirement for continuing to show that San Juan County meets the 2010 Primary SO₂ NAAQS. However, the annual report does not affect any permitting or regulatory action that would negatively affect stakeholders.

A more detailed description of this project is available for download at www.env.nm.gov/air-quality/proposed-regs/, or in hard copy at the Bureau's main office, 525 Camino de los Marquez, Santa Fe, New Mexico 87505.

Contacts

The public is encouraged to contact Bureau or NMED staff at any time with questions or comments regarding this Plan or the annual report, or for help in accessing public participation opportunities.

Project and Public Involvement Plan contact:

Cindy Hollenberg, Environmental Analyst Air Quality Bureau 525 Camino de los Marquez Santa Fe, NM 87505

Phone: (505) 476-4356

Email: cindy.hollenberg@state.nm.us

Website:

Outreach materials and notices will include links to the following website:

https://www.env.nm.gov/air-quality/proposed-regs/

Non-English Language Speaker Assistance and Accommodations:

The Bureau will include information about how persons may request non-English speaker language assistance and accommodations for persons with disabilities. If any person requires non-English Language Speaker Assistance, assistance for an interpreter or auxiliary aid (e.g., accommodations for persons who are disabled) to participate in review of this report, please contact the Project contact listed below, preferably 14 days prior to the end of the public comment period. TDD or TTY users please access the number via the New Mexico Relay Network, 1-800-659-1779 (voice); TTY users: 1-800-659-8331).

Community Descriptions/LEP Analysis

To address potential or existing environmental justice areas, Bureau staff completed an initial screening of the potentially affected communities using the EJSCREEN tool developed by the EPA. This tool helps identify communities with demographic factors which may benefit from a variety of approaches for notification and outreach communication.

Table 1 summarizes the demographics of potentially affected communities analyzed using the EJSCREEN tool, including the proportion of limited English proficiency persons.

Version: May 2018

Table 1: Potentially affected communities and their estimated demographics.

Potentially Affected Communities	Total number of households	Per capita income	Percent minority population	Percent of population not speaking English at home*	Percent Limited- English Proficient individuals†	Percent of linguistically isolated households
San Juan County	40,643	\$22, 460	59%	33%	6%	4%
San Juan Generating Station – 4 mi	403	\$22,251	48%	22%	1%	1%
New Mexico	762,551	\$24,459	61%	35%	6%	5%
USA	117,716,237	\$29,829	39%	21%	5%	8%

^{*}Significant languages in these households include Navajo and Spanish.

Using the results of the EJSCREEN ACS Summary Report, San Juan County and the area immediately surrounding San Juan Generating Station include areas which may benefit from additional public participation support. Two areas were analyzed: (1) a 4-mile buffer surrounding the San Juan Generating Station; and (2) all of San Juan County. San Juan County was included in the analysis, since the EPA designation that depends on continued reporting is for the county.

The results of the EJSCREEN analysis are as follows:

- 1. A higher percentage of the population in the affected communities have a lower per capita income, compared to state and national demographic data;
- 2. Compared to national demographic data, these areas have a higher population of minorities, although the proportion of minorities are lower than the State average;
- 3. Compared to national demographic data, these areas have higher populations not speaking English at home, although the proportion is lower than the State average;
- 4. The 4-mile buffer community comprises 1% of individuals who speak English "less than very well" and who do not speak English at home the "Limited English Proficient individuals." This is a significantly lower percentage than the State average of 6%;
- 5. San Juan County has 6% of individuals considered to be "Limited English Proficient individuals." This is the same percentage as the State average.
- 6. Only 1% of households in the 4-mile buffer are considered "linguistically isolated," while 4% in San Juan County are considered so. Both are lower than the State average of 5%.

No meetings are anticipated, as this project should garner little attention. Should a meeting be requested, NMED will respond with an update to this Public Involvement Plan, including further outreach efforts to announce the meeting and a contingency plan, should we be unable to hold the meeting, due to unforeseen circumstances. A hearing will not be required.

To help incorporate the language and communication needs of this community when conducting public outreach, the Bureau will provide public service announcements to nearby Chapter Governments of the Navajo Nation and to a Navajo radio station. This will consist of public comment notices to make public

Version: May 2018

[†]Limited English Proficient Individuals are those that speak a language other than English at home **and** who speak English "less than very well."

participation efforts as inclusive as possible within Bureau budget and time limitations. Notices will include information on how to request additional materials in another language or how to request other communication assistance through NMED. These outreach efforts are outlined more in depth below.

In addition, persons with disabilities may request additional services and arrangements necessary for participation in all public involvement activities by using the information provided in the "Contacts" and "Document Repositories" sections of this Plan.

Details of Outreach Activities

The public may ask questions about this project at any time, regardless of the public comment period. However, to be included in the administrative record, comments solicited by public notices must be submitted during the noticed comment periods in accordance with the requirements of the public notice. Additionally, the public may request to review official project documents at the Bureau or through one of the document repositories listed below.

As discussed above, materials will be distributed to Navajo-speaking entities. The Bureau has concluded, through a separate analysis, that materials will not be translated into a language other than English.

The NMED field offices will serve as access areas for the Bureau to leave hard copies of important documents and information about how to comment on the proceeding as well as instructions to access this information electronically. Specific repository addresses are provided on page 6.

The following tables offer information of how the public will be invited to participate in this project.

Table 2: Timeline of public involvement opportunities. Regulatory or statutory deadlines are in **bold.** Note that dates may be approximate. Notices will contain final dates, and specific locations and times.

Activity	Dates
PIP development.	April 2018
Notice of draft annual report via ListServ and NMED web site.	May 15, 2018
Public review and informal comment period.	May 15, 2018 - June 15, 2018
Submit Annual Report and comment summary to U.S. EPA Region 6.	July 1, 2018

Additional Community Outreach:

Bureau Staff will make every effort to follow this Plan. However, this timeline is tentative and subject to change. Should significant changes to this timeline occur, the Plan will be amended and republished in the same manner as the original plan.

Because San Juan County includes tribal lands over which the Bureau does not have jurisdiction, a copy of the Annual Report, the announcement of its availability and the process for comment (in English) will be emailed to the following Chapter Governments of the Navajo Nation:

- Hogback (tsedaakaan@navajochapters.org)
- Upper Fruitland (upperfruitland@navajochapters.org)
- Nenahnezad (nenahnezad@navajochapters.org)
- San Juan (sanjuan@navajochapters.org)
- Huerfano (huerfano@navajochapters.org)

Public Involvement Plan Annual Report - SJGS Version: May 2018 Page 5

Additionally, an announcement will be sent to KTNN radio of document availability and comment period.

A ListServ announcement of document availability and comment period will be sent to subscribers of the AQB Regulatory and SIP Announcements, and to the subscribers of the AQB Four Corners Air Quality Group. To receive email updates through NMED's ListServ, sign up electronically at https://public.govdelivery.com/accounts/NMED/subscriber/new, then choose which topics you are most interested in. This project will periodically send updates to the topic lists described above.

Document Repositories:

The following is a list of locations where copies of relevant documents will be available to the community:

Santa Fe	Farmington	Grants/Milan
525 Camino de los Marquez, Ste. 1 Santa Fe, NM 87505 Telephone: 505.476.4300	3400 Messina Drive, Ste. 5000 Farmington, NM 87402 Telephone: 505.566.9741	708 Uranium Ave. Milan, NM 87020 Telephone: 505.209.4042

Electronic copies are available at:

https://www.env.nm.gov/air-quality/proposed-regs/

Public Involvement Plan Annual Report - SJGS Version: May 2018 Page 6





Location: User-specified point center at 36.802470, -108.438577

Ring (buffer): 4-mile radius
Description: SJGS-4mi buffer

Summary of ACS Estimates			2011 - 2015
Population			1,332
Population Density (per sq. mile)			27
Minority Population			641
% Minority			48%
Households			403
Housing Units			440
Housing Units Built Before 1950			26
Per Capita Income			22,251
Land Area (sq. miles) (Source: SF1)			49.33
% Land Area			99%
Water Area (sq. miles) (Source: SF1)			0.44
% Water Area			1%
	2011 - 2015	_	
	ACS Estimates	Percent	MOE (±)
Population by Race			
Total	1,332	100%	363
Population Reporting One Race	1,332	100%	868
White	698	52%	362
Black	52	4%	99
American Indian	469	35%	271
Asian	0	0%	16
Pacific Islander	0	0%	11
Some Other Race	113	8%	109
Population Reporting Two or More Races	0	0%	46
Total Hispanic Population	121	9%	267
Total Non-Hispanic Population	1,211		
White Alone	690	52%	341
Black Alone	52	4%	99
American Indian Alone	469	35%	271
Non-Hispanic Asian Alone	0	0%	16
Pacific Islander Alone	0	0%	11
Other Race Alone	0	0%	11
Two or More Races Alone	0	0%	44
Population by Sex			
Male	723	54%	212
Female	609	46%	238
Population by Age		15 1 15	
Age 0-4	72	5%	101
Age 0-17	358	27%	167
Age 18+	974	73%	249
Age 65+	109	8%	82





Location: User-specified point center at 36.802470, -108.438577

Ring (buffer): 4-mile radius

Description: SJGS-4mi buffer

	2011 - 2015 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	842	100%	243
Less than 9th Grade	27	3%	101
9th - 12th Grade, No Diploma	62	7%	72
High School Graduate	219	26%	·121
Some College, No Degree	382	45%	135
Associate Degree	133	16%	75
Bachelor's Degree or more	151	18%	130
Population Age 5+ Years by Ability to Speak English			
Total	1,259	100%	322
Speak only English	987	78%	252
Non-English at Home ¹⁺²⁺³⁺⁴	272	22%	235
¹ Speak English "very well"	254	20%	233
² Speak English "well"	18	1%	32
³ Speak English "not well"	0	0%	21
⁴Speak English "not at all"	0	0%	46
3+4Speak English "less than well"	0	0%	48
2+3+4Speak English "less than very well"	18	1%	50
Linguistically Isolated Households*			
Total	3	100%	20
Speak Spanish	0	0%	11
Speak Other Indo-European Languages	0	0%	11
Speak Asian-Pacific Island Languages	0	0%	16
Speak Other Languages	3	100%	17
Households by Household Income			
Household Income Base	403	100%	101
<\$15,000	28	7%	72
\$15,000 - \$25,000	6	2%	26
\$25,000 - \$50,000	97	24%	73
\$50,000 - \$75,000	101	25%	64
\$75,000 +	172	43%	94
Occupied Housing Units by Tenure			
Total	403	100%	101
Owner Occupied	330	82%	107
Renter Occupied	73	18%	88
Employed Population Age 16+ Years	70	1070	00
Total	974	100%	238
In Labor Force	630	65%	221
Civilian Unemployed in Labor Force	89	9%	95
Not In Labor Force	343	35%	132

^{*}Households in which no one 14 and over speaks English "very well" or speaks English only.





Location: User-specified point center at 36.802470, -108.438577

Ring (buffer): 4-mile radius

Description: SJGS-4mi buffer

	2011 - 2015 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	1,259	100%	322
English	N/A	N/A	N/A
Spanish	N/A	N/A	N/A
French	N/A	N/A	N/A
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	N/A	N/A	N/A
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	N/A	N/A	N/A
Chinese	N/A	N/A	N/A
Japanese	N/A	N/A	N/A
Korean	N/A	N/A	N/A
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	N/A	N/A	N/A
Other Asian	N/A	N/A	N/A
Tagalog	N/A	N/A	N/A
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	N/A	N/A	N/A
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	N/A	N/A	N/A
Total Non-English	N/A	N/A	N/A

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. Source: U.S. Census Bureau, American Community Survey (ACS) 2011 - 2015.

*Population by Language Spoken at Home is available at the census tract summary level and up.





Location: San Juan County Ring (buffer): 0-mile radius

Description:

Summary of ACS Estimates			2011 - 2015
Population			125,133
Population Density (per sq. mile)			23
Minority Population			73,816
% Minority			59%
Households			40,643
Housing Units			49,562
Housing Units Built Before 1950			1,569
Per Capita Income			22,460
Land Area (sq. miles) (Source: SF1)			5,513.18
% Land Area			100%
Water Area (sq. miles) (Source: SF1)			25.26
% Water Area			0%
	2011 - 2015		
	ACS Estimates	Percent	MOE (±)
Population by Race	nes Estimates		
Total	125,133	100%	0
Population Reporting One Race	121,125	97%	2,543
White	66,443	53%	804
Black	691	1%	226
American Indian	46,829	37%	658
Asian	644	1%	97
Pacific Islander	68	0%	48
Some Other Race	6,450	5%	710
Population Reporting Two or More Races	4,008	3%	545
Total Hispanic Population	24,504	20%	0
Total Non-Hispanic Population	100,629	2070	U
White Alone	51,317	41%	83
Black Alone	604	0%	216
American Indian Alone	45,398	36%	476
Non-Hispanic Asian Alone	623	0%	97
Pacific Islander Alone	64	0%	46
Other Race Alone	71	0%	74
Two or More Races Alone	2,552	2%	444
Population by Sex	.,002	270	3 150
Male	62,024	50%	118
Female	63,109	50%	118
Population by Age			
Age 0-4	9,358	7%	94
Age 0-17	34,383	27%	690
Age 18+	90,750	73%	1,210
Age 65+	15,526	12%	649





Location: San Juan County Ring (buffer): 0-mile radius

Description:

	2011 - 2015 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	78,855	100%	120
Less than 9th Grade	5,332	7%	486
9th - 12th Grade, No Diploma	8,723	11%	639
High School Graduate	25,297	32%	881
Some College, No Degree	27,527	35%	1,054
Associate Degree	8,001	10%	598
Bachelor's Degree or more	11,976	15%	706
Population Age 5+ Years by Ability to Speak English			
Total	115,775	100%	94
Speak only English	77,674	67%	1,312
Non-English at Home ¹⁺²⁺³⁺⁴	38,101	33%	1,241
¹ Speak English "very well"	31,200	27%	1,242
² Speak English "well"	3,867	3%	405
3Speak English "not well"	2,158	2%	330
⁴Speak English "not at all"	876	1%	204
3+4Speak English "less than well"	3,034	3%	387
2+3+4Speak English "less than very well"	6,901	6%	559
Linguistically Isolated Households*			
Total	1,534	100%	233
Speak Spanish	629	41%	171
Speak Other Indo-European Languages	35	2%	37
Speak Asian-Pacific Island Languages	40	3%	26
Speak Other Languages	830	54%	152
Households by Household Income			
Household Income Base	40,643	100%	629
< \$15,000	6,467	16%	501
\$15,000 - \$25,000	4,326	11%	396
\$25,000 - \$50,000	10,031	25%	620
\$50,000 - \$75,000	6,767	17%	549
\$75,000 +	13,052	32%	721
Occupied Housing Units by Tenure			
Total	40,643	100%	629
Owner Occupied	29,820	73%	646
Renter Occupied	10,823	27%	532
Employed Population Age 16+ Years			
Total	94,394	100%	243
In Labor Force	56,993	60%	950
Civilian Unemployed in Labor Force	5,255	6%	559
Not In Labor Force	37,401	40%	927

^{*}Households in which no one 14 and over speaks English "very well" or speaks English only.





Location: San Juan County Ring (buffer): 0-mile radius

Description:

	2011 - 2015 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	115,775	100%	94
English	77,674	67%	1,602
Spanish	12,278	11%	935
French	298	0%	144
French Creole	21	0%	35
Italian	34	0%	41
Portuguese	67	0%	70
German	235	0%	113
Yiddish	0	0%	27
Other West Germanic	83	0%	96
Scandinavian	0	0%	27
Greek	11	0%	16
Russian	7	0%	10
Polish	17	0%	27
Serbo-Croatian	0	0%	27
Other Slavic	0	0%	27
Armenian	0	0%	27
Persian	0	0%	27
Gujarathi	25	0%	38
Hindi	27	0%	30
Urdu	0	0%	27
Other Indic	33	0%	47
Other Indo-European	0	0%	27
Chinese	57	0%	59
Japanese	23	0%	25
Korean	55	0%	43
Mon-Khmer, Cambodian	0	0%	27
Hmong	0	0%	27
Thai	5	0%	7
Laotian	0	0%	27
Vietnamese	29	0%	24
Other Asian	2	0%	4
Tagalog	193	0%	105
Other Pacific Island	44	0%	51
Navajo	23,965	21%	1,133
Other Native American	567	0%	297
Hungarian	0	0%	27
Arabic	2	0%	4
Hebrew	23	0%	25
African	0	0%	27
Other and non-specified	0	0%	27
Total Non-English	38,101	33%	1,605

^{*}Population by Language Spoken at Home is available at the census tract summary level and up.

	•	





