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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 6 1201 ELM STREET, SUITE 500 DALLAS, TEXAS 75270

April 26, 2021

Ms. Pamela Jones Board Administrator, Environmental Improvement Board New Mexico Environment Department P.O. Box 5469 Santa Fe, NM 87502

RE: EIB 21-05, Proposed Good Neighbor State Implementation Plan Certification for the 2015 Ozone National Ambient Air Quality Standards.

Dear Ms. Jones:

Thank you for the opportunity to review the Proposed Good Neighbor State Implementation Plan Certification for the 2015 Ozone National Ambient Air Quality Standards for which the state published a public hearing notice for May 28, 2021. We appreciate the significant work and analysis that the New Mexico Environment Department (NMED) has put forth to address this important Clean Air Act requirement. We are providing the following additional information for your consideration to strengthen the technical support further for the SIP revision.

On March 15, 2021, EPA finalized the Revised Cross-State Air Pollution Rule Update for the 2008 Ozone National Ambient Air Quality Standards (Revised CSAPR Update). As part of this rulemaking EPA relied on air quality modeling using a 2016 emission platform to evaluate interstate contributions to monitors that are expected to have problems attaining or maintaining the ozone standards in 2021. The Air Quality Modeling TSD for the Proposed Revised Cross-State Air Pollution Rule Update describes the air quality modeling performed and results. Air quality modeling is used to project ozone design values at individual monitoring sites to 2021 and to estimate state-by-state contributions to those 2021 concentrations. The projected 2021 ozone design values are used to identify ozone monitoring sites that are projected to be nonattainment or have maintenance problems in 2021 for both the 2008 and 2015 ozone standards. Ozone contribution information for 2021 is then used to quantify projected interstate contributions from emissions in each upwind state to ozone design values at projected nonattainment and maintenance sites in other states. The revised CSAPR Update modeling shows that for the 2015 ozone standards and a threshold of 1% of the standards New Mexico is not linked to any nonattainment receptors nor any maintenance receptors in 2021.

The Air Quality Modeling TSD for the Proposed Revised Cross-State Air Pollution Rule Update as well as the file containing base period, projected ozone design values and the projected contribution metric values (i.e., contributions) at individual monitoring sites based upon EPA's

air quality modeling for the Proposed Revised CSAPR update are available at <u>https://www.regulations.gov/document/EPA-HQ-OAR-2020-0272-0064</u>.

If you have any questions or comments regarding this letter, please contact me at (214) 665-7161 or Sherry Fuerst of my staff at (214) 665-6454.

Sincerely,

Acting Chief, Infrastructure & Ozone Section

cc: Mr. Kerwin Singleton, NMED Mr. Michael Baca, NMED Mr. Armando Paz, NMED