



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



May 25, 2011

N3615 (2350)

Ms. Rita Bates
Air Quality Bureau
New Mexico Environment Department
1301 Siler Rd, Building B
Santa Fe, New Mexico 87507

Dear Ms. Bates:

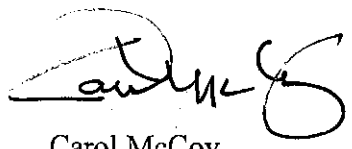
The National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) have reviewed New Mexico's March 31, 2011, revised draft State Implementation Plan (SIP) to comply with 40 CFR 51.309(g) of the Regional Haze Rule. Our detailed comments are enclosed.

In summary, we are pleased that New Mexico has addressed several of our previous comments. In particular, the earlier draft SIP indicated that visibility at the U.S. Forest Service's Gila Wilderness would degrade by 2018. An error in analyzing the air quality modeling by the Western Regional Air Partnership has been identified and corrected, and visibility at Gila Wilderness is no longer projected to degrade. However, the model still projects that visibility will degrade slightly by 2018 on the 20% best days at Carlsbad Caverns National Park. Our enclosed comments recommend improvements to the reasonable progress analysis.

You may recall that we commented on a previous draft Section 308 plan on August 17, 2010, and the draft Section 309 plan on February 2, 2011. On March 31, 2011, we provided New Mexico a copy of our comments to the Environmental Protection Agency (EPA) Region 6 concerning the Federal Implementation Plan for Interstate Transport of Pollution Affecting Visibility and Best Available Retrofit Technology (BART) Determination proposed for San Juan Generating Station (SJGS). We agreed with EPA's proposed emissions limit for sulfur dioxide of 0.15 lbs/MMBtu on a 30-day rolling average to limit interstate transport and that NO_x BART for SJGS is Selective Catalytic Reduction technology with an emissions limit of 0.05 lbs/MMBtu.

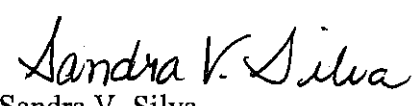
We appreciate the opportunity to work closely with the state to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Pat Brewer, NPS, at (303) 969-2153 or Tim Allen, FWS, at (303) 914-3802.

Sincerely,



Carol McCoy
Chief, Air Resources Division
National Park Service

Sincerely,



Sandra V. Silva
Chief, Branch of Air Quality
U.S. Fish & Wildlife Service

Enclosure

cc:

Joe Kordzi
Air Planning Section
U.S. EPA Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

**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.

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 SO₂ 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 NO_x 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 NO_x 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.

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.