



# New Mexico Environment Department

Sunland Park Ozone Nonattainment SIP Revision  
Armando Paz, Environmental Analyst  
Air Quality Bureau

Joint Advisory Committee  
77<sup>th</sup> Meeting  
July 16, 2020





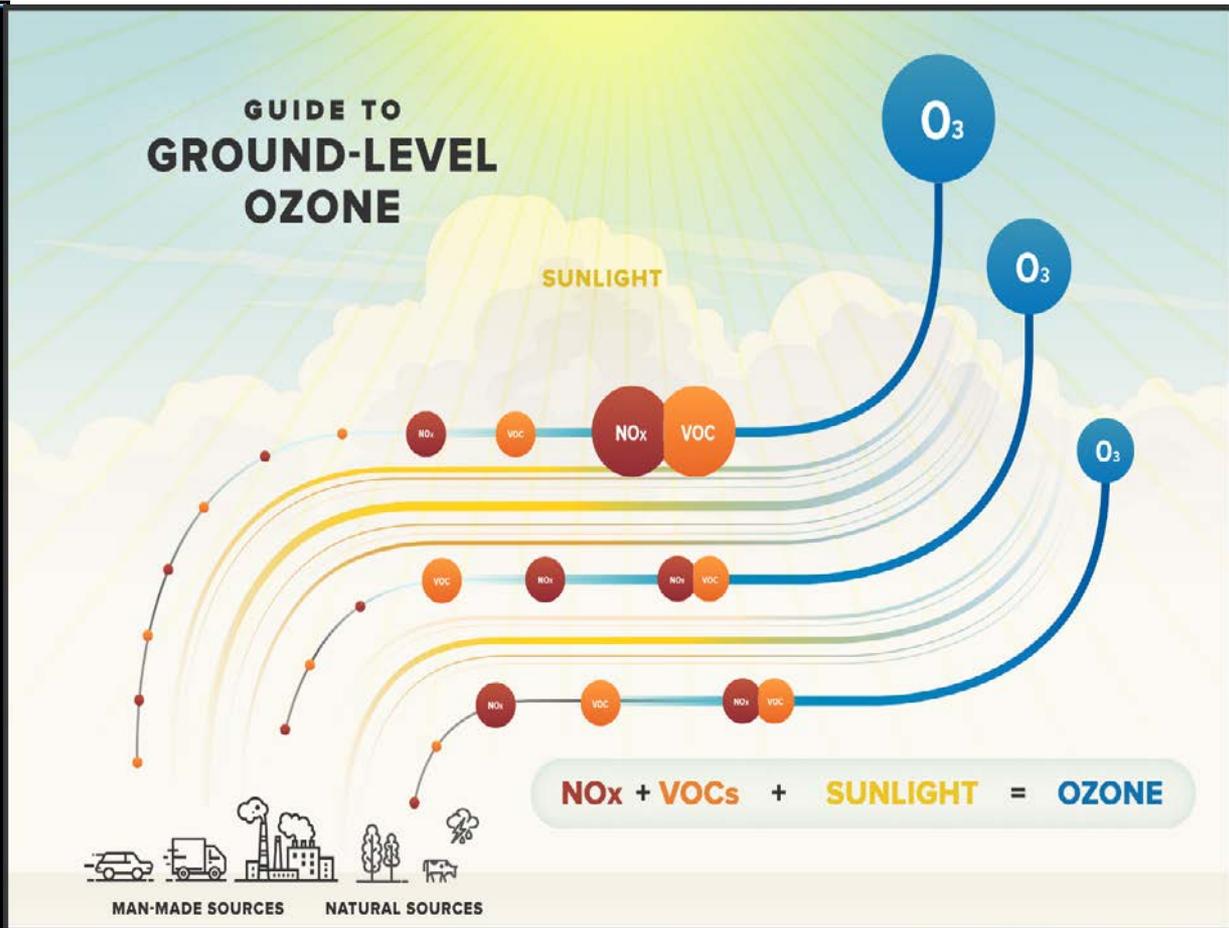
# Overview

## 2015 8-Hr. Ozone NAAQS

- Monitoring
- Design Values
- Nonattainment Area

## Nonattainment SIP

- Scope
- Applicability
- Compliance





# 2015 Ozone NAAQS

- Level
  - 70 ppb
- Averaging Time
  - 8-Hour average
- Form
  - Design Value
    - Three year average of annual 4<sup>th</sup> max 8-hour averages
    - Determines compliance
- Primary Standard
  - Public health protection
- Secondary Standard
  - Public welfare protection
  - Same as Primary Standard



# Monitoring for $O_3$

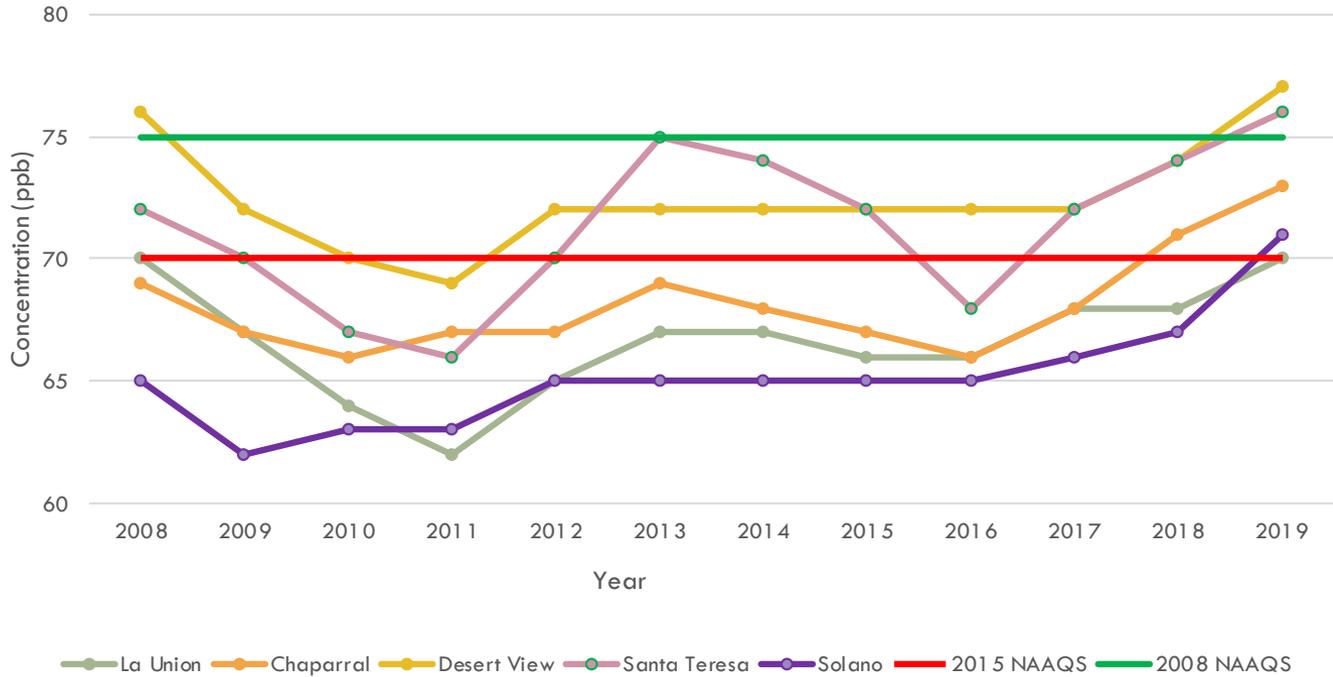
- $O_3$  Sites
  - Desert View
  - Santa Teresa
  - La Union
  - Chaparral
  - Solano Rd.





# Design Values

### Doña Ana County Design Values





# Violating the NAAQS = Nonattainment

## Nonattainment

### Classifications

- Marginal
- Moderate
- Serious
- Severe
- Extreme

- Violation
  - ▣ Design Value above level of NAAQS
- Nonattainment Designation
  - ▣ Sunland Park Area
    - Marginal Nonattainment in 2018
  - ▣ EPA Rulemaking Process
  - ▣ Classifications
    - Based on Severity of Problem
  - ▣ Planning and Regulatory Requirements
    - State Implementation Plan (SIP) Revision



# Sunland Park Designated 8-Hour Ozone Marginal Nonattainment Area (NAA)





# SLP Ozone Nonattainment SIP

- Transportation Conformity
  - El Paso Metropolitan Planning Organization
  - Completed in July 2019
- Emissions Inventory
  - Baseline Inventory with Periodic Updates
  - Certification Statement
    - Authority to collect emissions information
  - Due August 3, 2020
- Nonattainment New Source Review
  - Due August 3, 2021



# Emissions Inventory (EI)

- Compilation of emissions and sources
  - ▣ 2017 Baseline & 3 Year Periodic Inventories
  - ▣ Coincide with NEI triennial years
- Ozone Precursors: NO<sub>x</sub> & VOC
- Point, Area, & Mobile (Non/On-Road)
  - ▣ Excludes Biogenic (Only Anthropogenic Sources)
- Ozone Season: June-August
- Ton Per Year & Ton Per Day (ozone season)
- Partial County – Nonattainment Area
  - ▣ Top-Down Approach
  - ▣ Use Population/Employment as surrogate activity data
  - ▣ SLP NAA population & employment accounts for 7.9% & 41% of DAC



# Emissions Statement

- Certification that NMED's Emission Inventory regulation meets CAA provisions for nonattainment
- 20.2.73.300 NMAC – *Emission Inventory Requirements*
  - Ozone NAA source emissions > 25 tpy of NO<sub>x</sub> and VOC
  - Annual emissions reported annually
- Minimum data requirements:
  - Identifying and contact information
  - Certificate of Data Accuracy (Certifying Statement)
  - Actual Emissions – Peak ozone season
    - Operating Schedule
    - Control Equipment Information
    - Daily process or fuel combustion rates
    - Annual emissions in tpy
    - Daily emissions in lbs./day



# NNSR Permitting Requirement

- Construction permit program
  - ▣ Sources within NAA
  - ▣ Requires emission decreases while allowing some industrial growth
- 20.2.79 NMAC – *Nonattainment Permits*
  - ▣ New Major Source
    - > 100 tpy VOC or NO<sub>x</sub>
  - ▣ Major Modification of Existing Source
    - Significant emissions increase (≥ 40 tpy)
- Lowest Achievable Emissions Rate (LAER)
  - ▣ Most stringent emission limitation for source class or category
  - ▣ Change in raw material processed, process modification and/or add-on controls
- Emission Offsets
  - ▣ 1.1:1 Offset (Emissions Reductions: Increase)
  - ▣ Obtained from existing sources
  - ▣ Net Air Quality Benefit
- Public Participation Requirements



# Timeline & Development SIP

- Emission Inventory & Emissions Statement
  - ▣ 30 Day Public Comment Period
    - July 2020
  - ▣ August 3, 2020 Deadline
- Nonattainment New Source Review (NNSR)
  - ▣ 20.2.79 NMAC Adequacy Review
  - ▣ Possible Revisions and Hearing Required
  - ▣ August 3, 2021 Deadline
- Next Steps
  - ▣ Develop a 179(b) demonstration
  - ▣ Attainment of NAAQS “but for” International Emissions



# Questions and Contact Information

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