



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, Texas 75202 - 2733**

FEB 01 2013

Mr. Richard Goodyear
Air Quality Bureau
New Mexico Environment Department
1301 Siler Road
Building B
Santa Fe, NM 87507



Dear Mr. Goodyear:

Thank you for providing the New Mexico Environment Department's (NMED) Exceptional Events Demonstration for Particulate Matter in New Mexico for 2008 and the Historical Fluctuations and Trajectory Analysis regarding the National Ambient Air Quality Standard (NAAQS) exceedances for particulate matter (PM) at air monitoring sites in Doña Ana and Luna Counties.

We request additional information to ensure the demonstration meets the requirements of the "Treatment of Data Influenced by Exceptional Events" rule. *See 72 FR 13560 dated March 22, 2007.*

The enclosed Technical Review provides an outline for the required information necessary for a complete evaluation of the circumstances on the day of the event. We understand the level of effort required to develop a demonstration for such a significant number of events may take some time, but ask that you keep us advised of your progress and if there is any way that we may be able to assist.

We appreciate the work and effort of the NMED to develop this exceptional events demonstration. If you have any questions, please contact me at (214) 665-2230 or have your staff contact Jim Afghani of my staff at (214) 665-6615.

Sincerely yours,

Maria Martinez
Chief, Air Quality Analysis Section

Enclosure

cc:
Donna Intermont, Chief, Operations Section

Appendix B1. Checklist for High Wind Exceptional Events Demonstration Submission

Completeness Checklist for High Wind Dust Exceptional Events.

Instructions: This checklist is provided as a guideline to help submitting agencies identify the types of information and analyses to include in an exceptional events demonstration package. In some cases (e.g., wind speeds above the identified high wind threshold), agencies will not need to include all parameters under each criterion. The EPA encourages agencies to include a completed checklist with their submitted exceptional events demonstration package. Note that completion of this checklist does not indicate that the event in question is concurable nor does it guarantee a “complete” package. The EPA may ask for clarification or additional information to support a specific criterion.

Site Name/AQS ID: _____

Pollutant: _____

Date(s): _____

Procedural Criteria		EPA Use
Did an exceedance of the NAAQS occur?	[Y/N]	
Were data flagged by July 1 st of following year?	[Y/N]	
Was there a 30-day public comment period?	[Y/N]	
Is documentation for the comment period included?	[Y/N]	
If public comments were received, are the public comments and responses included?	[Y/N]	
Was the package submitted within 3 years of the end of the quarter in which the event occurred and 12 months prior to the date that any regulatory decision must be made by EPA?	[Y/N]	

(over)

Evidence	Information Included	Page(s)	EPA Use
Conceptual Model			
-description of weather phenomena resulting in high wind	[Y/N]	[page #]	
-description of what sources were likely entrained by the high wind	[Y/N]	[page #]	
-explanation of the path by which the dust reached the monitor(s)	[Y/N]	[page #]	
-map showing relevant monitors, topography, other relevant geographic features	[Y/N]	[page #]	
-description of how the event day differs from non-event days	[Y/N]	[page #]	
-description of concentration and wind patterns for the exceeding monitor(s) and surrounding area	[Y/N]	[page #]	
Wind Statistics			
-max sustained wind (Hourly avg)	[X mph]	[page #]	
- max sustained wind (1-5 min avg)	[X mph]	[page #]	
-max gust (1 min avg)	[X mph]	[page #]	
-wind trajectories included?	[Y/N]	[page #]	
-other:	[list other wind analyses]	[page #]	
nRCP			
-Area-specific high wind threshold (default = 25mph)	[25 mph]	[page #]	
-sources contributing to event identified, including anthropogenic vs. natural?	[Y/N]	[page #]	
-controls identified for anthropogenic sources? (note: level of control analysis depends on wind speed)	[Y/N]	[page #]	
-are natural sources not reasonably controllable?	[Y/N]	[page #]	
-was a High Wind Action Plan included?	[Y/N]	[page #]	
HF			
-were time-series analyses for concentration and wind data included?	[Y/N]	[page #]	
-annual comparison to historical data (wind and concentrations)	[%ile]	[page #]	
-seasonal comparison to historical data (wind and concentrations)	[%ile]	[page #]	
CCR (=> AAQ & / Natural Event)			

-were spatial analyses included, establishing a spatial relationship between the event, sources, transport of emissions, and recorded concentrations?	[Y/N]	[page #]	
-were temporal analyses included, establishing a temporal relationship between the high wind and elevated PM concentrations at the monitor?	[Y/N]	[page #]	
-comparison of event-affected day(s) to specific non-event days?	[Y/N]	[page #]	
-was the dust shown to be from the sources discussed in the nRCP section?	[Y/N]	[page #]	
-were alternative hypotheses discussed?	[Y/N]	[page #]	
-was a causal (not just correlational) relationship established?	[Y/N]	[page #]	
NEBF			
-was a but-for analysis included?	[Y/N]	[page #]	