Message

From: Melanie Hotchkiss [melanie.hotchkiss@tceq.texas.gov]
Sent: 7/24/2019 10:06:18 PM
To: Crawford, Dorothy [Crawford.Dorothy@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]
CC: cindy.maresh_tceq.texas.gov [cindy.maresh@tceq.texas.gov]; Weslee Copeland [weslee.copeland@tceq.texas.gov]
Subject: RE: PM10 Exceedances, Socorro 48-141-0057, El Paso, 2017 and 2018, discussions for Initial Notification
Attachments: 2017-2018 Socorro Hueco EE Initial Notification Letter_final.pdf

Hi Dorothy & Fran. Attached is an electronic copy of the Initial Notification of Potential Exceptional Events letter that was sent out via certified mail earlier today.

We have appreciated your help and guidance on this new process and look forward to working with you further.

Thanks,
Melanie

Melanie Hotchkiss
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From: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Sent: Tuesday, July 2, 2019 3:56 PM
To: Melanie Hotchkiss <melanie.hotchkiss@tceq.texas.gov>; Cindy Maresh <cindy.maresh@tceq.texas.gov>; Weslee Copeland <weslee.copeland@tceq.texas.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: PM10 Exceedances, Socorro 48-141-0057, El Paso, 2017 and 2018, discussions for Initial Notification

Thanks for speaking with me today. Some notes and follow-up from the call are below.

I understand TCEQ is planning to send an Initial Notification for the subject PM10 exceedances to formally start the Exceptional Event (EE) process. Attached is the updated R6 guidance on the Initial Notification letter. The Initial Notification letter is sent to our branch chief Jeff Robinson, while the future Exceptional Event Demonstration needs to be sent to the Regional Administrator. Courtesy email copies to Fran Verhalen, Air Monitoring and Grants Section Chief, and myself are always welcome, especially with our recent physical office move: United States Environmental Protection Agency, Region 6, 1201 Elm Street, Suite 500, Dallas, Texas 75270 – 2102.

Also attached are example Initial Notifications from NM and City of Albuquerque. Submittal of AQS reports with the Initial Notification letter is not required. Note the example letters have now incorrect address and branch chief name.

The AQS report I ran this morning shows the 4/25/17 exceedance has been flagged with IJ, informational high wind but the 5/2/18 exceedance has a 'P' indicating the data point exceeds standard. Prior to the EPA concurrence or non-concurrence on the future EE Demonstration you submit, I will need the exceedances flagged in AQS with RJ, Request for Exclusion but we have time.

Please look at your schedules and your knowledge base about the conditions on the exceedance dates to develop a proposed tentative date that works for you for the submittal of the EE Demonstration. This can be communicated by email or phone to me, or you can put it in the Initial Notification letter. The EPA R6 response to your Initial Notification will discuss the target date for the EE Demonstration submittal. Remember to work in time for a 30 day public notice period of the EE Demonstration, prior to submittal.

Take a look at the April 2019 EPA national high wind guidance for the criteria for Tier 1 (Large-scale and high-energy high wind dust event, or Haboob), Tier 2 (High Wind Threshold 25 mph), or Tier 3, approach to the preparation of the EE Demonstration. Your expected Tier approach is not a requirement of the Initial Notification letter. The national high wind guidance can be found at https://www.epa.gov/air-quality-analysis/final-2016-exceptional-events-rule-supporting-guidance-documents-updated-faqs

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