Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 4/13/2018 8:14:02 PM
To: Baca, Michael, NMENV [michael.baca1@state.nm.us]
CC: Bates, Rita, NMENV [Rita.Bates@state.nm.us]; Verhalen, Frances [verhalen.frances@epa.gov]; Intermont, Donna, NMENV [Donna.Intermont1@state.nm.us]; Singleton,Kerwin, NMENV [Kerwin.Singleton@state.nm.us]; judy.fisher@state.nm.us; mary.hilbert@state.nm.us
Subject: RE: PM10 Exceedances, 2015-2017, Luna and Dona Ana Counties, NM
Attachments: NMED 2015 2017 PM10 Exceedances 4 13 18.xlsx

Mike, Thanks for the reminder about PM10 rounding. That resolved most of my questions.

Attached is today's version of the excel file. Red text in excel is for pending NMED changes to AQS. About the details on the list of candidate Initial Notification monitor/days/events, the attached revised excel file reflects:

35-013-0016-81102-2, 4/25/17. - NMED plans to enter a high wind flag in AQS.

35-013-0016-81102-2, 5/16/17 - AQS report AMP435 Daily Summary and AMP350 Raw Data Reports (run on 3/19/18) shows 24-hour arithmetic mean to be 142.6 µg/m^3. I understand from your email that NMED plans to revise the hourly data currently in AQS and expects the revised 24-hour arithmetic mean to be 196 µg/m^3. NMED plans to enter a high wind flag in AQS. [This issue may relate to the 'AN' machine malfunction flag for 1400 hour on this day.]

35-013-0019-81102-2, 4/25/17 - AQS report AMP435 Daily Summary and AMP350 Raw Data Reports shows 24-hour arithmetic mean to be 154 µg/m^3, I think the 155 in my original excel file was a typo. Rounding result in no exceedance. I removed from attached.

35-029-0003-81102-2, 3/12/16 - Rounding result in no exceedance. I removed from attached.

Let me know when AQS changes are made and I will run new reports to verify. This can wait. No hurry for EE purposes but would be good to resolve AQS revisions prior to 2017 Data Certification purposes.

The 2015 thru 2017 PM10 exceedances at monitors in Luna and Dona Ana Counties appear to have current Regulatory Significance except for the 2016 and 2017 exceedances at 35-013-0024-81102-2. If there are 2018 exceedances at 35-013-0024-81102-2, the 2016 and 2017 exceedances may gain Regulatory Significance. The revised PM10 exceedances summary table, once AQS changes are complete:

Monitor	POC	Actual Exceedances	Estimated Exceedances	Actual Exceedances	Estimated Exceedances	Actual Exceedances	Estimated Exceedances
35-013-0016	2	1	1	6	6	5	x.1
35-013-0019	2	0	0	1	1	2	2.1
35-013-0020	1	2	2	4	4		
35-013-0020	2			5	5.4	6	6
35-013-0021	1	3	4				
35-013-0021	2			8	8.3	8	8
35-013-0024	2			1	1	1	1
35-029-0003	2			3	3.1	5	5

Talk with you next Wed.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

From: Baca, Michael, NMENV [mailto:michael.baca1@state.nm.us]
Sent: Thursday, April 12, 2018 4:04 PM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Cc: Bates, Rita, NMENV <Rita.Bates@state.nm.us>; Verhalen, Frances <verhalen.frances@epa.gov>; Intermont, Donna, NMENV <Donna.Intermont1@state.nm.us>; Singleton,Kerwin, NMENV <Kerwin.Singleton@state.nm.us>; judy.fisher@state.nm.us; mary.hilbert@state.nm.us
Subject: RE: PM10 Exceedances, 2015-2017, Luna and Dona Ana Counties, NM

Good afternoon Dot,

It seems that we have been in the process of deploying new monitors at our sites for the last few years and some discrepancies in the data were discovered. I have tried to answer the questions you posed to me in the email body below. I also included notes and a new exceedance (in red) to the spreadsheet you provided. We also found that we have four exceedances of the 24-Hour $PM_{2.5}$ NAAQS in 2017 (1 at 5ZS Hobbs Jefferson, 3 at 6ZM Desert View) and will have to evaluate the data to determine the regulatory significance.

In case you are not on our listserv for announcements, I wanted to let you know that a draft copy of the dust mitigation plans and fugitive dust rule are available for public review. This is an informal public comment period that will last through 4/30/17. The drafts can be downloaded at https://www.env.nm.gov/air-quality/proposed-regs/.

I think we are starting to get a clear picture of what we need to do for the formal initial notification letter, but I think we should discuss if we need to submit another notice for 2015. I look forward to our call next week.

Thanks,

Mike

From: Crawford, Dorothy [mailto:Crawford.Dorothy@epa.gov]
Sent: Monday, March 19, 2018 2:24 PM
To: Baca, Michael, NMENV <michael.baca1@state.nm.us>
Cc: Bates, Rita, NMENV <Rita.Bates@state.nm.us>; Verhalen, Frances <verhalen.frances@epa.gov>; Intermont, Donna, NMENV <Donna.Intermont1@state.nm.us>; Singleton,Kerwin, NMENV <Kerwin.Singleton@state.nm.us>; Fisher, Judy, NMENV <judy.fisher@state.nm.us>; Hilbert, Mary, NMENV <mary.hilbert@state.nm.us>
Subject: PM10 Exceedances, 2015-2017, Luna and Dona Ana Counties, NM

Mike, Attached is excel file I created with subject exceedances. I used various AQS reports to collect this data: Design Value and Actual and Estimated Exceedances, Daily Summary for 24-Hour averages, Raw Data to locate flags already entered by NMED). Would you please check me? Did I transfer info from AQS reports to excel file correctly? I am hoping this excel file can help us get on the same page about pending formal Initial Notifications. Thanks

I do not have access to AQS to run the reports mentioned below so I was unable to cross check the data you compiled in Excel. However, our QA section provided me with some background information on the monitoring network and additional data to try and answer the questions below. It seems that we have been in the process of deploying new monitors at our sites and some discrepancies in the data were discovered.

During the Initial Notification process, we will coordinate the question of Regulatory Significance for each exceedance by monitor. The first tab of the excel file ('By Monitor') helps us as we evaluate whether the particular exceedance at the particular monitor currently has Regulatory Significance. Regulatory Significance based on PM10 Design Value occurs when the 3 year average Estimated Exceedances exceeds 1. It appears the 2015 thru 2017 PM10 exceedances at monitors in Luna and Dona Ana Counties may have current Regulatory Significance except for the 2016 and 2017 exceedances at 35-013-0024-81102-2. If there are 2018 exceedances at 35-013-0024-81102-2, the 2016 and 2017 exceedances may become Regulatory Significant.

		2015		2016		2017	
Monitor	POC	Actual Exceedances	Estimated Exceedances	Actual Exceedances	Estimated Exceedances	Actual Exceedances	Estimated Exceedances
35-013-0016	2	1	1	6	6	4	4.1
35-013-0019	2	0	0	1	1	**2**	**2.1**
35-013-0020	1	2	2	4	4		
35-013-0020	2			5	5.4	6	6
35-013-0021	1	3	4				
35-013-0021	2			8	8.3	8	8
35-013-0024	2			1	1	1	1
35-029-0003	2			**3**	**3.1**	5	5

If the exceedances have Regulatory Significance, then NMED will need to evaluate how to approach the development of the Exceptional Event Demonstrations. It would be great if the formal Initial Notifications reflected NMED's approach, that is how you plan to group them or present them. I hope the second tab ('By Day') in the excel file will help with this. A day – or series of days - with multiple exceedances at monitors in an area may be a candidate for combining the exceedances into one Demonstration.

There were a few anomalies on the 'By Monitor' tab. Can you help clarify these? Something I am not understanding about the data? NMED decide there was not enough technical support for flags?

Unclear why NMED selected to not flag the 35-013-0016-81102-2 and 35-013-0019-81102-2 measurements on 4/25/17.

The exceedance recorded on 4/25/17 at 35-013-0016-81102-2 was not flagged due to the relatively low wind speeds recorded at the site on that date. After discussion, we felt this data should have been flagged for high wind as there were three other exceedances recorded on that day with high wind speeds recorded throughout the region. The data for 35-013-0019-81102-2 on this date was not flagged because NMED's data indicates a 24-hour average of 154 $\mu g/m^3$. Due to the rounding conventions for the PM_{10} NAAQS, this would not be an exceedance. I think we need to clarify what the true 24-hour average is for this date as your spreadsheet indicates 155 $\mu g/m^3$, which is an exceedance.

Unclear why AQS indicated only 2 Actual Exceedances in 2017 for 35-013-0019-81102-2 while other info seems to show 3 Actual Exceedances.

See above answer. This seems to indicate that the correct 24-hour average is 154 $\mu g/m^3$ on 4/25/17.

Similar for 2016 data from 35-029-0003-81102-2, the AQS DV report shows 3 Actual Exceedances but other info seems to show 4 Actual Exceedances.

Unclear why NMED selected to not flag the 35-029-0003-81102-2 measurement on 3/12/16.

See above answer.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

From: Baca, Michael, NMENV [mailto:michael.baca1@state.nm.us]
Sent: Wednesday, March 14, 2018 12:58 PM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>; Bates, Rita, NMENV <Rita.Bates@state.nm.us>; Verhalen, Frances <verhalen.frances@epa.gov>; Intermont, Donna, NMENV <Donna.Intermont1@state.nm.us>; Singleton,Kerwin, NMENV <Kerwin.Singleton@state.nm.us>; judy.fisher@state.nm.us; mary.hilbert@state.nm.us
Subject: NMED Exceptional Event Initial Notification Form

Good afternoon,

Please find a draft initial notification form and supporting data summary to be used to facilitate discussion about the process. I wanted to have feedback on these before proceeding with the rest of the dates for 2015 and 2016. I will speak to everyone shortly.

Thanks,

Mike
Michael Baca
NMED AQB
2301 Entrada del Sol
Las Cruces, NM 88001
(575) 288-2050