Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 4/16/2019 12:51:19 PM
To: dgates@cabq.gov
CC: Verhalen, Frances [verhalen.frances@epa.gov]; Salisbury, Dwayne N. [DSalisbury@cabq.gov]
Subject: FW: South Valley 35-001-0029-81102-1, 2018 exceedances of PM10 NAAQS level
Attachments: Exceptional Event Initial Notification 2016 rule updated April 16 2019.docx

Dan, I got your voicemail. Thanks for calling. We are ok with the city's Initial Notification for the 2018 exceedances being sent by the end of May but feel free to send the Initial Notification letter as soon as you have a good grasp on possible Demonstration(s) preparation timeline.

We have not yet discussed regulatory significance. I ran an AQS Design Value (DV) report for the Albuquerque area yesterday. The four 2018 PM10 South Valley exceedances causes a 2016-2018 DV calculation of 1.4. It appears at least some of the exceedances may have regulatory significance, since a PM10 24 Hours Design Value in excess of 1 can impact the evaluation of whether the area meets the NAAQS. Is this how the city views the regulatory significance of the four 2018 PM10 South Valley exceedances?

I have no information about the wind and meteorological conditions associated with the four exceedances. We could discuss whether the city wishes to move forward at this time with an Initial Notification and potential future Demonstration submittal for only some of the four exceedances, perhaps those with the strongest evidence. If the city provides sufficient evidence for R6 to concur on two of the 2018 PM10 South Valley exceedances, the 2016-2018 Design Value would drop below 1. If additional exceedances are measured at South Valley in 2019 or 2020, the remaining unaddressed 2018 exceedances may gain regulatory significance again, and an Initial Notification can be pursued at that time. This is similar to the situation we have been watching for the Jefferson site (35-001-0026) where 2016 exceedances could have gained regulatory significance if Jefferson site exceedances had been measured in 2017 and 2018, which did not occur.

It will be important to indicate in the Initial Notification letter the city's expectations on time frame needed to prepare and submit the subject/selected Demonstrations, including the 30 day public notice period. The Initial Notification process sets the target date(s) for the Demonstrations submittal(s) and we need to know your projected time frames.

I expect our response to the city's Initial Notification should occur well before our policy goal of 60 days. We are, however, about to enter the busy time of our year (Data Certifications in May, Annual Network Review Plans in July). I would like to start coordinating on when and how this project will be worked into both our schedules. In some ways, working on the Initial Notification process before the busy season, would be a benefit to us.

Attached is an updated guidance for the EE Initial Notification process to reflect our new organization effective Monday 4/15. Note potential address change by early June, discussed below. More changes coming for us. Please use our existing mailing address unless official change of address information comes out before your letter.

Would you like to have a conference call? I can provide call in number. Are you available:

Wed 4/17 9 am Dallas time/8 am Albuquerque time;
Mon 4/22 noon Dallas time/11 am Albuquerque time;
Thurs 4/25 11 am Dallas time/10 am Albuquerque time; or
Thurs 4/25 2 pm Dallas time/1 pm Albuquerque time?

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

From: Crawford, Dorothy
Sent: Monday, April 15, 2019 3:43 PM
To: Salisbury, Dwayne N. <DSalisbury@cabq.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: RE: South Valley 35-001-0029-81102-1, 2018 exceedances of PM10 NAAQS level

Been a while since you worked the process. Current policy is that we ask you to send the Initial Notification letter to our 'Associate Director' aka Branch Chief, who as of today is Jeff Robinson (see below). We realigned, starting today. If you could email Fran and myself when you send the letter, it would be appreciated.

Jeffery J. Robinson, Branch Chief, Air Permits, Monitoring & Grants Branch

Also, our physical location will be changing sometime in June but please use our existing mailing address unless official change of address information comes out before your letter.

Region 6, Environmental Protection Agency
1445 Ross Avenue
Dallas TX 75202-2733

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

From: Salisbury, Dwayne N. <DSalisbury@cabq.gov>
Sent: Monday, April 15, 2019 3:21 PM
To: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: RE: South Valley 35-001-0029-81102-1, 2018 exceedances of PM10 NAAQS level

Hello Dorothy,
We expect to start the Initial Notification Process for the exceedances listed below for site 35-001-0029 by May 31, 2019. Is this specific enough or do you require an exact date?

Thank you,

ONE ALBUQUERQUE environmental health

DWAYNE SALISBURY
manager | environmental health department
o 505.768.1966
m 505.239.1240
cabq.gov/environmentalhealth/

From: Crawford, Dorothy <Crawford.Dorothy@epa.gov>
Sent: Monday, April 15, 2019 1:28 PM
To: Salisbury, Dwayne N. <DSalisbury@cabq.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: South Valley 35-001-0029-81102-1, 2018 exceedances of PM10 NAAQS level

Dwayne, AQS is showing the city entered High Winds exclusion requested flags for four 24-hours periods in 2018, at the subject monitor:

1/15/18
2/12/18
4/19/18
7/11/18

Do you expect to start the Initial Notification process for these exceedances? If yes, can you give me an estimate of when you may start the process? Thanks

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

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This message has been analyzed by Deep Discovery Email Inspector.