



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733



December 2, 2004

Sandra Ely
Chief, Air Quality Bureau
New Mexico Environment Department
2048 Galisteo
Santa Fe, NM 87505

Dear Ms. Ely: *Sandra*

Thank you for the opportunity to review the proposed revisions to the State Implementation Plan (SIP) regarding the San Juan County Early Action Compact (EAC). These proposed changes are intended to incorporate the results of the San Juan County Early Action Compact for Ozone and adopt a voluntary emissions reduction program for ozone precursors in San Juan County. We appreciate the effort of your office, the Four Corners Ozone Task Force, and the Technical Peer Review Committee in the development of the EAC plans and in meeting to date all of the deadlines included in the EAC program.

We have reviewed the proposed SIP and our comments are enclosed. We fully support the San Juan County EAC and are pleased that the EAC area has demonstrated monitoring and modeling results far below the 8-hour standard for ozone.

We look forward to receiving the final EAC SIP submittal on or before December 31, 2004. My staff and I are available to assist you as we work toward that goal; please feel free to contact me (214-665-3102) or Ms. Carrie Paige of my staff if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Thomas Diggs".

Thomas Diggs, Chief
Air Planning Section (6PD-L)

Enclosure

EPA Region 6 Comments on the San Juan Proposed Early Action Compact State Implementation Plan (SIP) Revision

Clean Air Action Plan Components

1. State Implementation Plans and Enforceable Control Measures

Due to the low ozone design values that have been modeled for the EAC area, the NMED does not believe these results indicate that mandatory control measures are needed. Even with the low future ozone levels, your plan does include a very positive voluntary initiative in the EAC plan, the VISTAS program. As well, the plan includes the explanation that additional strategies will be developed and implemented in the event the CAAP fails. We appreciate your commitment to the CAAP and to ensuring that the area remains in attainment of the 8-hour ozone standard.

2. Public Outreach Campaign

Three activities were listed: website, public service announcements and educational outreach materials for children. Please specify the timeline for the development and implementation of each of these activities.

3. Voluntary Program for Emissions Controls

San Juan VISTAS is currently being run as a pilot program, administered by the NMED for the improvement of air quality in northwestern New Mexico. When will this program move out of the pilot stage? Please specify the timeline for the implementation of the final program.