To: Jackson, Scott[Jackson.Scott@epa.gov]
From: Russ, Timothy
Sent: Fri 9/6/2013 2:44:54 PM
Subject: FW: EPA Comments on General Conformity Discussion in NPL Preliminary DEIS - - REF. DRILL RIGS & NON-ROAD ENGINES
NPL General Conformity_4-16-13.docx
J-nichols-Drill-Rig-petition-EPA-response-6-2-09 (2) (2).pdf

Hi Scott,

NEPA (Suzanne) had sent these comments out, on the NPL project, back on April 16, 2013 and Ken D. forwarded the email to me at that time.

In the comments on the NPL project, we stated our views on drill rig non-road engines and referenced our letter to WEG on that subject. Here's what we said in the comments:

"EPA evaluated whether drill rig engines would qualify as a stationary source for the permit exemption. For this assessment, we first needed to establish how drill rig engines were defined by the State as being either ***stationary engines*** or ***non-road engines.*** EPA, however, was unable to find such definitions in either Wyoming's WAQSR Chapter 6 or WAQSR Chapter 8. Lacking such State definitions, we then relied on EPA's federal definitions. Engines which are considered as stationary sources are defined in 40 CFR 60.4219. With respect to the engines associated with drill rigs, they generally do not meet the above definition as they are defined as non-road engines in 40 CFR 1068.30. The exception to EPA's non-road engine definition is that non-road engines that remain at a single location for more than one year are not considered non-road engines (see 40 CFR 1068.30(2)). We have attached our June 2, 2009 letter which discusses EPA's interpretation of these definitions and how they apply to drill rig engines[1]."

Footnote #1 was: [1] See attached letter from EPA to Wild Earth Guardians, June 2, 2009.

The NPL comments may have gone to the relevant BLM field office, but I do note in Suzanne's transmittal email that she "cc'd" Charis Tuers.

Tim

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From: Russ, Timothy
Sent: Thursday, May 02, 2013 9:21 AM
To: Jackson, Scott
Subject: FW: EPA Comments on General Conformity Discussion in NPL Preliminary DEIS

Hi Scott,

Here you go - -

Tim

From: Distler, Kenneth
Sent: Tuesday, April 16, 2013 4:06 PM
To: Russ, Timothy; Razzazian, Christopher; Laumann, Sara; Jackson, Scott
Subject: FW: EPA Comments on General Conformity Discussion in NPL Preliminary DEIS

Fyi… forward to your relevant contacts… e.g. OGC/OAQPS…ken

From: Bohan, Suzanne

Sent: Tuesday, April 16, 2013 3:08 PM
To: jspeck@blm.gov
Cc: Tuers, Charis; Brian Hall; Daly, Carl; Fay, Kate; Distler, Kenneth; l50porte@blm.gov
Subject: EPA Comments on General Conformity Discussion in NPL Preliminary DEIS

Jim –

Thank you for the opportunity to provide input on the preliminary DEIS for the NPL Project. Attached are EPA's comments regarding the general conformity discussion in the document. Please let us know if you have any questions or if you would like to arrange a conference call to discuss our comments.

Suzanne J. Bohan

Director, NEPA Compliance and Review Program

Office of Ecosystems Protection and Remediation

EPA, Region 8

(303) 312-6925 (office phone)

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[1] See attached letter from EPA to Wild Earth Guardians, June 2, 2009.