**To:** Chris Horn[chris.horn@dot.gov]; Henderson - CDOT, Vanessa[vanessa.henderson@state.co.us]
**Cc:** Berry, Laura[berry.laura@epa.gov]; Dresser, Chris[Dresser.Chris@epa.gov]; Bailey, Chad[bailey.chad@epa.gov]; Owen, Chris[Owen.Chris@epa.gov]
**From:** Russ, Timothy
**Sent:** Thur 12/22/2016 8:34:57 PM
**Subject:** I-70 East Project - Request to FHWA for Additional Information and Preliminary Initial Comments
I-70E_AQ_Coop_Agency_Mtg_draft_Notes_EPA_Comments.docx

Hi Chris,

Staff at EPA (Region 8, OAQPS, and OTAQ) have spent the past several days reviewing the I-70 "Draft Air Quality Conformity Determination and NEPA Comparative Analysis" (hereafter, the "Draft"), the truck percentages spreadsheet, MOVES modeling information sent on the afternoon of Friday, December 16th , as well as AERMOD files sent Monday, December 19th. We wanted to make you aware of initial comments that we have at this point, and we request additional documentation of the analysis. We note that may have further comments as we continue to review the materials you have provided.

**A.)** Please note that EPA does not agree with the characterization of interagency consultation in the Draft. There are several statements in the Draft that indicate that EPA had reviewed the protocol for this last version of the analysis, or the analysis itself:

Page 6 of the "Draft Air Quality Conformity Technical Report" states:

"The approach to the air quality analysis has been documented throughout the I-70 East Project in the Air Quality Analysis Protocol and its updates. The procedures in this document [the protocol] have been reviewed through the Interagency Consultation process for each step in the NEPA process."

Page 1 of the "Air Quality NEPA Comparison Technical Report" states,

"The Interagency Consultation process continued to support the air quality analysis through the review of the updated … [CO and PM10] modeling completed for the ROD." (p. 1, lines 22-25).

We did not see a modeling protocol for this latest version of the I-70 East project's hot-spot

analyses. We requested to see the modeling for the analyses since the end of October and we did receive a weblink until mid-November to review certain modeling files. However, we did not receive the full Draft document until the start of the public comment period (December 16, 2016). Therefore, EPA does not agree that we, as part of the interagency consultation, "supported" the analysis through the "review of the updated modeling completed for the ROD."

**B.)** We don't agree with the Interagency Consultation statements in section 3, entitled "Changes Since the Final EIS" and page 2, first and second paragraphs which state the following:

"Through Interagency Consultation, it was confirmed that some of the content of the Final EIS need not be revised based on the updates noted above. Items not updated in this document include the emissions inventory of health-based National Ambient Air Quality Standards (NAAQS), mobile source air toxics (MSATs), and greenhouse gases (GHGs). In the Final EIS, the project examined regional emissions of these pollutants on a broad scale and followed FHWA guidance in *Interim Guidance Update on Mobile Source Air* 5 *Toxic Analysis in NEPA (December 6, 2012)*."

The Final EIS included an emissions inventory of atmospheric carbon dioxide for all alternatives discussed. Though there is new GHG guidance, Interagency Consultation with FHWA, EPA, and APCD confirmed that it is not necessary to repeat this analysis because of the following reasons:

- Changes to the project design are minimal, so changes to results of analysis at the air quality study area level—which includes the entire project, as well as the surrounding local road network—would not be noticeable

- The regional air quality inventory analysis is primarily a trend-line comparison between project alternatives. The Final EIS adequately discusses these trends for the use of a NEPA comparison and updates to the analysis for the ROD would not alter previously shown regional air quality trends

- The new GHG guidance states that projects that have published a Final EIS are not required to update their analysis."

EPA disagrees with FHWA's interpretation that Interagency consultation resulted in agreement to the above statements (concluding that content did not need revision or analysis was not necessary to repeat). At the October 25, 2016 Cooperating Agencies meeting, the EPA along

with the Colorado Department of Public Health and Environment (CDPHE) were given an update on the I-70 East project. During that meeting we and CDPHE were advised by FHWA/CDOT as to how the updated project information would be developed and included in the draft Record of Decision (ROD) for the project. We acknowledged the information being presented, but our participation at the meeting did not indicate concurrence or agreement. It was FHWA and CDOT that determined that certain aspects of the Air Quality NEPA Comparison Report would not be updated or reanalyzed. We also note that the meeting notes from Atkins's (please see the attached Word file with EPA's November 9, 2016 recommended edits) also do not indicate that concurrence or agreement was solicited or given by the EPA.

**C.)** The Draft also points to the wrong version of EPA's PM hot-spot guidance in several places. Page 8, line 4 of the Draft Conformity Technical Report has the November 2013 document number instead of the November, 2015 document number. Page 5, line 14 of the Air Quality NEPA Comparison Report also has the November, 2013 document number.

**D.)** To help us in our review of the analysis, we have the following requests for additional documentation:

1.) First is the information Chris Dresser has asked for, a description of how the emissions from the MOVES output databases are incorporated into the AERMOD EMISFACT tables. Chris's email from earlier today states: The part of the analysis that appears to be missing is how the emission factors contained in the EMISFACT portion of the AERMOD input files were calculated for each scenario. I am trying to cross-walk between the MOVES files, which contain emission rates for each link, to the volume sources in the AERMOD input file. Can you provide a decoder describing which volume sources correspond to which MOVES links? Also, if no intermediate calculation tables were used, where were the g/s emission rates determined? It is important for us to understand every calculation step performed. And for a complex project like this, we are unable to connect the dots without the additional information requested.

2.) EPA would like additional information on how vehicle volumes were applied to each hour of the day in determining the correct EMISFACT emission factor. What diurnal traffic profile was used, and why are certain hour's emission factors repeated, and others not? How refined is the traffic data that was used to determine hourly vehicle volumes?

3.) EPA would like a guide to AERMOD input/output file names to help us understand which project alternatives go with which AERMOD file names.

4.) We would also like information about the truck percentages in the spreadsheet. We understand links that are HOV or ML (managed lanes) would not be expected to have trucks, but there are other links not labeled as either of these types that have zero percent trucks – both I-70 links and surface streets. Why do these other links also have no trucks, and on what is this information based?

We appreciate your time in getting us the above requested information as soon as possible. This is in view that we are working within the 30-day public comment period and several of us will be out of the office over the holidays.

Many thanks,

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov