To: Meg Patulski[Patulski.Meg@epa.gov]; VanGessel, Benjamin[vangessel.benjamin@epa.gov]
From: Berry, Laura
Sent: Thur 12/22/2016 3:47:59 PM
Subject: draft I-70 email for immediate review

Ex. 5 - Deliberative Process

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).

Ex. 5 - Deliberative Process

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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 14 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

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

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

Ex. 5 - Deliberative Process

3. EPA would like a guide to AERMOD input/output file names, specifically, which project alternatives go with which AERMOD file names.

Ex. 5 - Deliberative Process

We appreciate your time in getting us this information as soon as possible, given we are within the 30 day comment period and several of us will be out of the office over the holidays.

Many thanks,

Laura Berry

(734) 214-4858

berry.laura@epa.gov

From: Dresser, Chris
Sent: Thursday, December 22, 2016 10:18 AM
To: Horn, Chris (FHWA) <Chris.Horn@dot.gov>
Cc: Vanessa Henderson - CDOT <vanessa.henderson@state.co.us>; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) <Carrie.Wallis@atkinsglobal.com>; Houk, Jeff (FHWA) <Jeff.Houk@dot.gov>; Claggett, Michael (FHWA) <Michael.Claggett@dot.gov>; Perritt, Karen (FHWA) <Karen.Perritt@dot.gov>; Berry, Laura <berry.laura@epa.gov>; Russ, Timothy <Russ.Tim@epa.gov>
Subject: RE: CO Moves files for EPA review

Chris,

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.

Chris Dresser

U.S. EPA – Region 8

1595 Wynkoop Street

Denver, Colorado 80202-1129

Phone: (303) 312-6385

From: Horn, Chris (FHWA) [mailto:Chris.Horn@dot.gov]
Sent: Wednesday, December 21, 2016 3:06 PM
To: Dresser, Chris <Dresser.Chris@epa.gov>
Cc: Vanessa Henderson - CDOT <vanessa.henderson@state.co.us>; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) <Carrie.Wallis@atkinsglobal.com>; Houk, Jeff (FHWA) <Jeff.Houk@dot.gov>; Claggett, Michael (FHWA) <Michael.Claggett@dot.gov>; Perritt, Karen (FHWA) <Karen.Perritt@dot.gov>; Berry, Laura <berry.laura@epa.gov>; Russ, Timothy <Russ.Tim@epa.gov>
Subject: RE: CO Moves files for EPA review

Chris,

Referred to FHWA

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017

From: Dresser, Chris [mailto:Dresser.Chris@epa.gov]
Sent: Monday, December 19, 2016 8:30 AM
To: Horn, Chris (FHWA)

Cc: Vanessa Henderson - CDOT; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com); Houk, Jeff (FHWA); Claggett, Michael (FHWA); Perritt, Karen (FHWA); Berry, Laura; Russ, Timothy
Subject: RE: CO Moves files for EPA review

Chris and Mike,

Could you also provide the scripts and/or intermediate tables that calculate the volume source emission rates from the MOVES output? It is important for us to understand how the cross-walk between MOVES links and AERMOD sources was performed.

Thanks,

-Chris

Chris Dresser

U.S. EPA – Region 8

1595 Wynkoop Street

Denver, Colorado 80202-1129

Phone: (303) 312-6385

From: Horn, Chris (FHWA) [mailto:Chris.Horn@dot.gov]
Sent: Sunday, December 18, 2016 8:51 AM
To: Dresser, Chris <Dresser.Chris@epa.gov>; Russ, Timothy <Russ.Tim@epa.gov>
Cc: Vanessa Henderson - CDOT <vanessa.henderson@state.co.us>; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) <Carrie.Wallis@atkinsglobal.com>; Houk, Jeff (FHWA) <Jeff.Houk@dot.gov>; Claggett, Michael (FHWA) <Michael.Claggett@dot.gov>; Perritt, Karen (FHWA) <Karen.Perritt@dot.gov>
Subject: RE: CO Moves files for EPA review

Tim and Chris,

Referred to FHWA

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017

From: Horn, Chris (FHWA)
Sent: Wednesday, November 23, 2016 8:41 AM
To: 'dresser.chris@epa.gov'; 'russ.tim@epa.gov'
Cc: 'Vanessa Henderson - CDOT'; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com); Houk, Jeff (FHWA); Claggett, Michael (FHWA); Perritt, Karen (FHWA)
Subject: RE: CO Moves files for EPA review

Tim and Chris,

Referred to FHWA

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017

From: Horn, Chris (FHWA)
Sent: Friday, November 18, 2016 10:47 AM
To: 'dresser.chris@epa.gov'; 'russ.tim@epa.gov'
Cc: 'Vanessa Henderson - CDOT'; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com); Houk, Jeff (FHWA); Claggett, Michael (FHWA)
Subject: CO Moves files for EPA review

Chris and Tim,

Referred to FHWA

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017