**To:** Russ, Timothy[Russ.Tim@epa.gov]
**Cc:** Denawa, Mai[Denawa.Mai@epa.gov]; Dubey, Susmita[dubey.susmita@epa.gov]
**From:** Odendahl, Steve
**Sent:** Thur 11/17/2016 4:17:15 PM
**Subject:** RE: Conference Call with FHWA - Re: I-70 East Project (9:30am MST!)

Hi Tim – Mai and I let Susmita know about this call; hopefully that's OK with you and hopefully Susmita can join, too.

Steve Odendahl ● Associate Regional Counsel ● US EPA Region 8 ● (303) 312-6219

**From:** Russ, Timothy
**Sent:** Thursday, November 17, 2016 8:42 AM
**To:** Jackson, Scott <Jackson.Scott@epa.gov>; Schuller, Jennifer <Schuller.Jennifer@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Rickard, Joshua <Rickard.Joshua@epa.gov>; Odendahl, Steve <Odendahl.Steve@epa.gov>; Denawa, Mai <Denawa.Mai@epa.gov>
**Subject:** Conference Call with FHWA - Re: I-70 East Project (9:30am MST!)
**Importance:** High

Hi Everyone,

**Ex. 5 - Deliberative Process**

**Ex. 6 - Personal Privacy**

Ex. 6 - Personal Privacy

For those that can attend here in Region 8, I have reserved the **Coneflower Room** on the 7th floor.

Ex. 5 - Deliberative Process

**From:** Berry, Laura
**Sent:** Thursday, November 17, 2016 8:21 AM
**To:** Karen Perritt <Karen.Perritt@dot.gov>; Russ, Timothy <Russ.Tim@epa.gov>; Patulski, Meg <patulski.meg@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Jackson, Scott <Jackson.Scott@epa.gov>
**Subject:** Here's an agenda for 11:30

Hi folks,

Karen, please forward to folks at FHWA attending. Tim, please do the same at R8

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

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Ex. 5 - Deliberative Process

# Ex. 5 - Deliberative Process

**La Casa (CASA)**
Region: Denver
Monitoring Station
4545 Navajo Street
SAROAD:
AQS ID: 080310026
Latitude: 39.779460
Longitude: -105.005124
Reporting capabilities (hourly)
SLAMS: CO, PM10, PM2.5
NAMS: O3, SO2
SPM: NO, RD, RS, TEMP, WD, WS

EPA's November, 2015 PM Hot-spot modeling guidance ("Transportation Conformity Guidance for Quantitative Hot-spot Analyses in $PM_{2.5}$ and $PM_{10}$ Nonattainment and Maintenance Areas") notes the following in section 9.3.4 *24-hour $PM_{10}$ NAAQS*:

Calculating Design Values and Determining Conformity

The 24-hour $PM_{10}$ design value is calculated at each receptor by directly adding the sixth-highest modeled 24-hour concentrations (if using five years of meteorological data) to the appropriate monitor value for the 24-hour background concentration from three years of monitoring data, based on Exhibit 9-6.[153] Exhibit 9-6: Monitor Value Used for Design Value Calculation

| Number of Background Concentration Values from the Monitor | Monitor Value Used for Design Value Calculation |
|---|---|
| < 347 | Highest Monitor Value |
| 348 -695 | Second Highest Value |
| 696 -1042 | Third Highest Value |
| 1043 -1096 | Fourth Highest Value |

**$PM_{10}$ data from the La Casa monitoring site are provided in the table below:**

**POC 1 1 in 3 Sampler**

| Year | N | Highest value | 2nd highest | 3rd highest | 4th highest |
|---|---|---|---|---|---|
| 2015 | 119 | 55 | 48 | 44 | 43 |
| 2014 | 127 | 66 | 65 | 62 | 62 |
| 2013 | 122 | 81 | 73 | 56 | 45 |

"N" = the number of days of valid data recovery.

**NOTE:** There are actually three $PM_{10}$ monitors co-located at the La Casa monitoring location. POC#1 is a "1 in 3" sampler and takes a sample every 3rd day; it is our understanding that this is the primary monitor as so designated by CDPHE. POC#2 is a "1 in 6" sampler and takes a sample every 6th day and POC#3 is a continuous monitor and samples every day.

**Ex. 5 - Deliberative Process**

# Ex. 5 - Deliberative Process

**4.) <u>Truck Volumes and Percentages:</u>**

We were aware before of a Sierra Club comment on the numbers and percentage of trucks on the I-70 East project. They had presented CDOT data that showed higher percentages of trucks than appeared to be used in the I-70 East FEIS. This issue, and using Sierra Club's comments, was also raised by two Denver City Councilmembers, in a letter to EPA dated 4/26/16, as follows:

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on 1-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

FHWA provided the below response:

# Referred to FHWA

Referred to FHWA

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

# Ex. 5 - Deliberative Process

Thanks!

Tim

Tim Russ
Environmental Scientist
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