Message

From: Thurman, James [Thurman.James@epa.gov]
Sent: 7/30/2019 7:18:03 PM
To: Matichuk, Rebecca [Matichuk.Rebecca@epa.gov]
Subject: RE: SO2 Annual Verification Report

Thank you.

James A. Thurman, Ph.D.
U.S. EPA/OAQPS/AQAD
Air Quality Modeling Group (C439-01)
109 T.W. Alexander Drive
Research Triangle Park, NC 27711
Phone: (919) 541-2703
Fax: (919) 541-0044
Email: thurman.james@epa.gov

From: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>
Sent: Tuesday, July 30, 2019 2:43 PM
To: Tillerson, Clint <Tillerson.Clint@epa.gov>
Cc: Thurman, James <Thurman.James@epa.gov>
Subject: RE: SO2 Annual Verification Report

Hi Clint,

Thanks so much for your feedback and quick response. Your feedback will be extremely helpful in our next steps. I don't think I have any follow-up questions right now. I have a meeting scheduled with the permit lead tomorrow morning, so I'll let you know if anything comes up afterwards.

In any case, I think I'd like to continue our discussion regarding the level of analysis or types of analyses that should be used for determining emissions increases and decreases.

James – Welcome back to the office. **Ex. 6 Personal Privacy (PP)**

Regards,
Rebecca
303-312-6867

From: Tillerson, Clint <Tillerson.Clint@epa.gov>
Sent: Tuesday, July 30, 2019 9:57 AM
To: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>
Cc: Thurman, James <Thurman.James@epa.gov>
Subject: RE: SO2 Annual Verification Report

Hi Rebecca,

I think I have a good understanding of the issues. Here are some general comments. I have also commented on each of your specific questions below in blue and put comments in your Word doc, attached. Many of the responses are similar in all 3 places. (Also attaching the ND report for James' benefit, if he is curious or interested.)

After you have a chance to read through them, let me know if you would like to talk later this afternoon. I will be out from around 1:15-3:15, Eastern.

General comments:

Ex. 5 Deliberative Process (DP)

From: Matichuk, Rebecca <Matichuk.Rebecca@epa.gov>
Sent: Monday, July 29, 2019 12:01 PM
To: Tillerson, Clint <Tillerson.Clint@epa.gov>
Subject: SO2 Annual Verification Report
Importance: High

Hi Clint,

I have attached two documents for review. The document that has the Wednesday deadline is titled "NorthDakotaDDRReport2019LH - For public comment + RIM notes.pdf" The high-lighted text notes where I have questions and includes a comment bubble. I also outlined the questions below. As mentioned, I didn't want to take text out of context so my recommendation would be to review in pdf, but my specific questions and your responses may be

easier to work with below instead of in pdf....your preference. If possible, I would appreciate your feedback on my questions below/in the bubbles. Please note that my comment bubble in Table 1 is associated with the "Model Design Value" column and not the rows that are high-lighted. The rows were high-lighted by the State.

The second document titled "R8_DRR_Verifications_Terminations_Outline_07292019.docx" is what I'm working on for our management briefing and a potential approach for the level of analysis needed for the Annual Verification Reports and Termination Requests. Again, this is very preliminary and I would appreciate any feedback relating to the content and questions in the comment bubbles. Might be easier to respond within the WORD document.

My schedule is completely open today and I have a lot of time tomorrow if you'd like to discuss any of the questions or documents in more detail.

Thanks so much for you help! My apologies for the extremely short timeframe.
Rebecca

QUESTIONS

1. Page 1, Paragraph 2: "Because of its proximity to LOS and CCS, the DRR source Stanton Station was also included in the same modeling analysis as a nearby source. ...The Antelope Valley Station (AVS) and the Great Plains Synfuels Plant were modeled together with the Coyote Station."

Ex. 5 Deliberative Process (DP)

2. Page 2, Paragraph 1: "According to the ORR (80 FR 51088), if an SO2 source used allowable emissions in modeling to successfully demonstrate compliance with the SO2 NAAQS, then the State is not required to submit future annual reports for that source." Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

3. Page 2, Paragraph 4: "Based on 40 CFR 51.1205(c), LOS does not need to be addressed in these future emissions tracking reports for the ORR, because of Basin Electric's use of allowable emissions for their sources in their modeling analyses." Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

4. Page 4, Paragraph 1: "If the most recent year's annual emissions are lower than what was modeled, then the source's concentrations should still comply with the 1-hour SO2 NAAQS." See general comments #5 and #6 above.

Ex. 5 Deliberative Process (DP)

6. Page 4, Paragraph 4: "The North Dakota Department of Environmental Quality (NDDEQ) accessed the CAM AMPD database and evaluated the data for annual SO2 emissions."

Ex. 5 Deliberative Process (DP)

7. Page 6, Paragraph 1: "As seen in Table 1, there is a 24% increase in emissions at Coyote in 2018 compared to the average of the years modeled (2012-2014)...The maximum concentration (i.e., design value) in the vicinity of Coyote, based on the modeling that was approved by EPA, is 115 µg/m3...which is only about 59% of the NAAQS."

Ex. 5 Deliberative Process (DP)

8. Table 1. Model Design Values.

Ex. 5 Deliberative Process (DP)

==========
Rebecca Matichuk, PhD
Environmental Scientist
U.S. Environmental Protection Agency
Region 8 – Air and Radiation Division
Air Toxics, Radiation & Modeling Branch (8ARD-TRM)
1595 Wynkoop Street
Denver, CO 80202
Office Number: 303-312-6867
==========