Message

From: Matichuk, Rebecca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=16F8C962B98F4DE08E63D15CC4BD1B26-MATICHUK, REBECCA]
Sent: 7/29/2019 4:00:56 PM
To: Tillerson, Clint [Tillerson.Clint@epa.gov]
Subject: SO2 Annual Verification Report
Attachments: R8_DRR_Verifications_Terminations_Outline_07292019.docx; NorthDakotaDDRReport2019LH - For public comment + RIM notes.pdf

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)

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)

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."

Ex. 5 Deliberative Process (DP)

5. 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)

6. 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)

7. Table 1. Model Design Values.

Ex. 5 Deliberative Process (DP)

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