Message

From: Razzazian, Christopher [Razzazian.Christopher@epa.gov]
Sent: 1/20/2016 7:05:31 PM
To: Matichuk, Rebecca [Matichuk.Rebecca@epa.gov]
CC: Jackson, Scott [Jackson.Scott@epa.gov]
Subject: FYI - FW: Reno Creek - Air Quality

FYI – I followed up with Angelique on the past work we were doing with Reno Creek again and she realized we had sent the language we had worked on, but had forgot to forward to us.

You'll see the email, below.

Chris

From: Diaz, Angelique
Sent: Wednesday, January 20, 2016 11:39 AM
To: Razzazian, Christopher <Razzazian.Christopher@epa.gov>
Subject: FW: Reno Creek - Air Quality

Here's the language I sent. I have not received a reply, to date.

Angelique D. Diaz, Ph.D., P.E.
NEPA Lead Reviewer
USEPA Region 8 (EPR-N)
1595 Wynkoop Street, Denver, CO 80202
(303) 312-6344

From: Diaz, Angelique
Sent: Monday, December 07, 2015 9:31 AM
To: 'Caverly, Jill' <Jill.Caverly@nrc.gov>
Subject: Reno Creek - Air Quality

Jill,

Again, we appreciate the opportunity to discuss our comments on the Reno Creek ISR Draft SEIS. It is our understanding that NRC will provide the EPA an updated response to comments document based on the discussion. We look forward to reviewing the updated response to comments. Following our 11/16 call, we had additional discussions with our air modeler regarding the content of the call. As a result, I'd like to share with you the following information regarding the air quality analysis, as well as follow up on the ozone, cumulative modeling comment we discussed.

We would like to clarify our concerns with the utilization of the air quality assessment from the Dewey-Burdock project to support the Reno Creek far-field air quality impacts and AQRVs. In particular, if the model results from the Dewey-Burdock project will be tiered to disclose far-field and AQRV impacts for this project, we recommend including an analysis of the differences in the emissions for the various pollutants and activities. This analysis will be helpful because we have not had the opportunity to review the emissions from the Reno Creek project to understand how the emissions relate to the Dewey-Burdock project. We also recommend summarizing the model results from the Dewey-Burdock project that are based on the model cases that do not employ the dry depletion option in the Reno Creek EIS documents because the model configuration aligns more closely to EPA's recommended modeling guidelines.

In regards to the ozone, cumulative modeling, far-field modeling, and the AQRV assessment, we continue to recommend scheduling a conference call with the relevant Federal Land Managers or collaborating agencies to assist in determining the air quality analyses that could be appropriate to qualitatively disclose the air quality impacts. It may also be helpful to contact the BLM – Wyoming air quality specialists to determine whether any photochemical grid modeling analyses are completed or underway and could be used for this project for cumulative impacts. One platform that has been completed and could be a candidate for use could be the modeling used for the Continental Divide-Creston (CD-C) project Final EIS, noting that there are deficiencies with this platform that would need to be disclosed and accounted for when interpreting and discussing the results. Without the feedback from the other agencies, it is difficult to recommend a path forward. The agencies and contacts that could be helpful in this discussion, include but may not be limited to:

Rebecca Matichuk – Environmental Protection Agency
Charis Tuers – Bureau of Land Management
Ken Rairigh – Wyoming Department of Environmental Quality
Tim Allen – Fish and Wildlife Service
Mike Barna – National Parks Service
Bret Anderson – Forest Service

Although we understand that the NRC does not plan on conducting additional air quality modeling to address our comments related to the methodology implemented for the near-field air quality analysis to predict NAAQS and HAPs impacts, we continue to recommend that the NRC conduct air quality modeling that aligns with EPA guidelines and fills in the gaps for other air pollutants, such as HAPs. This would include:

- Presenting model exceedances on an annual basis;
- Using emission rates that are based on short-term standards;
- Including emissions from all emission sources;
- Ensuring proper justification and implementation of the dry depletion option (refer to EPA comments provided on October 19, 2015) or modeling without the use of dry depletion;
- Conducting Increment Comparisons at Class I and Sensitive Class II areas; and
- Modeling HAPs.

Please let me if additional assistance or clarification is needed. We are happy to discuss our comments above in more detail and are open to another call.

Thank you,
Angelique

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