Message

From: Mues, Pascal [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B2AB2E32A7049D78F063FA77D054524-PMUES]
Sent: 5/7/2020 2:04:55 AM
To: Goodwin, Cathleen@Waterboards [Cathleen.Goodwin@waterboards.ca.gov]
Subject: RE: Draft Comments regarding City of Eureka Ammonia Modeling Proposal
Attachments: 200505_RB comments on Evaluation of NH3 Toxicity - comments from Pascal.docx

Cathy – I fortunately was able to make time to review your letter this afternoon. Just please don't hold me to this kind of turnaround time in the future ☺

In general, nice work. I had about a dozen various suggestions for how the language that could be clarified and/or made easier for the applicant to implement. Some of my longer sidebar comments might get annoying to read in that tiny font; I was trying to explain my thinking in detail so I hope you don't take the comment length as some kind of reflection on the quality of your work.

I mostly attempted to point out where you might get confusion or push-back from the modeling consultant and how to rephrase things to get out in front of such questions. Over half are issues that a permit writer simply wouldn't know about without having done models before, such as terminology that has a specific meaning in the modeling context ("modeling error" / model error) which is different from what you were using it to mean. I'm happy to have a quick call Thursday or Friday if you find any of my suggestions unclear.

Thanks for continuing to push this forward, it's so rare to get the chance to ask for improvements to a modeling submission *before* the permit reissuance clock starts ticking. Fingers crossed that we can improve the environmental outcomes to the same degree!

-Pascal

Pascal Mues, Environmental Engineer
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From: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>
Sent: Tuesday, May 5, 2020 8:34 PM
To: Mues, Pascal <Mues.Pascal@epa.gov>
Cc: Moore, Heaven@Waterboards <Heaven.Moore@Waterboards.ca.gov>; Whitson, Amelia <Whitson.Amelia@epa.gov>
Subject: Draft Comments regarding City of Eureka Ammonia Modeling Proposal

Hi Pascal:

I sure appreciated the discussion we had last month regarding the City of Eureka Ammonia Modeling proposal. I finally have the comments organized. I have attached them for your review and comment back to me if you have time. We had hoped to get these to the City by the end of April, but alas, I was juggling too many balls to meet that hoped for deadline. I am hoping to get comments out to the City by later this week or early next week.

If I have missed anything important in my comments, or misstated anything, please point those kinds of things out to me.

I know that you are very busy. Please let me know if you have time to look this over and the timing.

It is a pleasure working with you on this.

Cathy

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The governor of California has issued a statewide shelter in place order due to the COVID-19 emergency. The Water Boards are continuing day-to-day work protecting public health, safety, and the environment. However, most staff are working remotely and we continue to check email and voicemail regularly. Thank you and stay healthy and safe.