From: Bohning, Scott
To: Lyons, Ann; Lee, Anita; McKaughan, Colleen
Subject: FYI, comment I made on NGS EIS protocol scenarios
Date: Friday, May 09, 2014 6:00:54 PM

Ann / Anita / Colleen -

Here is text I sent as comment:

EPA is concerned that the specification of scenarios prejudges the outcome of EPA's final action on our proposal for BART controls on NGS. We would like the various protocols to make it clear that a decision has not yet been made to adopt one of the Technical Work Group (TWG) alternatives. We would also like an acknowledgment that should EPA finalize the proposed BART (SCR on all three units), the various scenarios included in this draft protocol, and the EIS based upon them, would not be valid. The extended compliance deadline would also not be valid (2023 extended from 2019). We recommend that the proposed BART be included as a scenario. We also recommend that the relationship of the proposed BART level of emissions with respect to the emissions in the "bookends" scenarios be described.

- Scott B.
P.S. I will be out of the office starting 5/9, returning 5/19.