

Wayne Bixler

From: Rivera, Shirley <Rivera.Shirley@epa.gov>
Sent: Monday, August 05, 2013 3:36 PM
To: Wayne Bixler; Brian Parkey
Cc: Holladay, Cleveland; Aquitania, Manny
Subject: RE: Bowie Power Station - Revised Modeling Protocol

[Manny – FYI, this is a PSD project – S.]

[Cleve – Per our discussions – S.]

====

Wayne / Brian,

Here are our comments – page number and topic referenced.

SUMMARY:

Our comments include observations, suggestions, clarification requests and future discussions. Also, there are a few where we are in need of (or have initiated) discussions with OAQPS.

DETAILS:

1) p. 1-1 (Intro and Proj Background)

- Fenceline – Please confirm that the “perimeter fence line” is an actual physical fence line that would prevent public access to contiguous property owned by the facility.

2) p. 1-3

- Suggestion – Make statement that project is less than significant for lead (Pb).

3) p. 2-1 (Reg Status)

- 5th listed bullet (visibility) – Add ... Assessment of the project’s impacts to visibility, including Class II areas. (See comment #16)

4) p. 2-2 (Tribal Lands)

- Nearby Tribal Land – Also reference other nearby Tribal Lands, e.g., Tohono O’odham.

5) p. 3-8 (Particulate Matter)

- Qualitative analysis – R9 may later follow-up on this. At a minimum, the draft guidance of March 2013 PM2.5 should be adhered to.

6) p. 3-12 (Nitrogen Dioxide)

- List of sources – What is the criteria of the list of sources? Based on Class I, Class II, emissions, etc.?
- Isolated source – R9 will follow-up with OAQPS regarding the interpretation and level of additional detail here for Bowie being characterized as an isolated source with respect to monitoring site justification. Also, we noted that the level of detail for CO is much more specific and detailed than NOx.

7) p. 3-13 (Table of NOx sources)

- Tons Per Year - What was the date cut-off for the PTE? The concern is whether or not any subsequent significant revisions that may have more emissions (or less) are considered/reflected.

8) p. 3-17 (Background Concentration)

- Isolated source – See comment #6. As a for example, we/R9 recently did permit a project in a relatively similar setting. We did not consider that project an isolated source.

9) p. 4-1 (Project Emission Sources)

- Fugitives – If there are vehicles used for O&M and operations, their fugitive emissions should be included in the tpy.
- Model assumptions – Modeled values should be based on worst-case operating assumptions (e.g., partial load, low temperature, etc.), when applicable.

10) p. 5-3 (Soil and vegetation impacts)

- Assumptions – See comment #16

11) p. 5-5 (Cooling Tower Emissions)

- PM2.5 fraction of PM10 - R9 will follow-up with OAQPS regarding the assumption of the PM2.5 fraction of PM10. We note in Table 4-1, the cooling tower PM2.5 fraction at 2.0 tpy is estimated at 46%-47% of the PM10 estimate (of 4.3 tpy).

12) p. 5-7 (Met data)

- Site-specific data – We would like more information (e.g., can follow-up with ADEQ) to better understand the selected data. Are more years of met data (beyond Apr 2001-Apr 2002) available? Generally would use up to 5 years, if available, per App. W.

13) p. 5-14 (AERMOD, Prelim Analysis, PVMRM)

- Missing hourly ozone values – We would like more information (e.g., can follow-up with ADEQ) to better understand how the missing values will be determined to be representative. For example, we'd like to make sure whether the preceding hourly data (December 2001) are conservative.

14) p. 5-14 (NO2/NOx ratios)

- In addition to CAPCOA 2011 – We request that Bowie conduct an additional survey for NO2/NOx in-stack ratios (ISRs) for the 3 types of equipment outlined. The CAPCOA guidance does not reflect more current ISRs.
- Turbine Start-up / Shutdown (SU/SD) – For the turbine NOx modeling, separate ISRs should be used. The ISR during SU/SD is greater than during normal operations.
(We can discuss more with you all, if needed.)

15) p. 6-1 (Class I Area Analyses)

- Closest Class I Areas – Please include applicable nearby Class I areas I New Mexico - <http://www.epa.gov/visibility/class1.html>.
(We recall that for the El Paso Natural Gas Willcox project, there was a U.S. FWS Class I area in New Mexico.)
(We can discuss more with you all, if needed.)

16) p. 7-1 (Additional Impacts Analysis)

We will forward information for this item.

- Soils and Vegetation – While we have a screening guidance document, we also have other examples of how soils and vegetation have been addressed. However, we do not recommend using the

NAAQS secondary standards as a comparison. We will forward this information, based on the FR Notice of the final rule for the NO2 and SO2 NAAQS standards.

- Class II Visibility Impairment – A Class II visibility impairment analysis is needed. This would include federal and state areas, recreational sites, etc. We/R9 require identifying areas, doing a VISCREEN analysis, etc.
- Growth – We will forward you information that includes examples from other R9 projects. (We can discuss more with you all, if needed.)

= = =

- Shirley

Week of Aug 5: *Planned **IN** Mon-Wed.; Annual Leave Thurs; Furlough Fri.*
Week of Aug 12: *Planned **IN** Tues-Fri.; Annual Leave Mon.*
