

**From:** Caverly, Jill  
**Sent:** Wednesday, January 08, 2014 2:59 PM  
**To:** Andrew Keyfauver (andrew.keyfauver@wyo.gov)  
**Subject:** Reno Creek ISR Project - Summary of Call NRC/WYDEQ

Andrew,

I apologize for the delay in sending you the summary of our call on December 18, 2013 regarding the Reno Creek ISR Project. Below is a summary of the call. Please review and let me know if you have any corrections.

### **Summary of Telecom with WDEQ re: Reno Creek ISR Project**

The purpose of this email is to confirm Nuclear Regulatory Commission (NRC) staff's understanding concerning key topics discussed with Wyoming Department of Environmental Quality (WDEQ) staff in a teleconference on air quality topics for the proposed Reno Creek ISR project held on December 18, 2013. Participants included Andrew Keyfauver (WDEQ), Jill Caverly (NRC), Marla Morales (Southwest Research Institute®), and Bradley Werling (Southwest Research Institute®).

The basis of the discussion for air quality review was the following preliminary estimated project emission levels which are generated almost entirely from fugitive sources (e.g., fugitive dust from travel on unpaved roads and combustion emissions from drill rigs and other mobile sources):

Preliminary Estimated Emissions (Metric Tons per Year) for the Proposed Reno Creek ISR Project

Pollutant				
CO	NOx	PM10	PM2.5	SO2
50	226	157	35	23

Following are the key topics:

- Emissions from fugitive sources are not regulated by WDEQ. However as part of the WDEQ permitting considerations, the applicant would need to demonstrate that the proposed project would not result in noncompliance with the National Ambient Air Quality Standards (NAAQS) or Wyoming Ambient Air Quality Standards (WAAQS).
- Air modeling is not necessarily required for such a demonstration. WDEQ requires an adequacy of the compliance demonstration rather than specifying the method or approach used in the demonstration.
- Should modeling for the Reno Creek Project be conducted, a modeling protocol should be developed with input from stakeholders such as WDEQ.
- Technical analyses (i.e., modeling) have been conducted by mines in the area supporting Bureau of Land Management (BLM) Lease-Buy Applications. Andrew volunteered to send us some of the publically available technical analyses.
- WDEQ does not designate any areas as "sensitive receptors" beyond the recognition of the Class I areas as identified by the Federal Government. Andrew suggested that National Parks Service staff may consider Devil's Tower as sensitive area.
- WDEQ does not have any formal rules or guidance that address modeling considerations for the transport of fugitive particulate matter (e.g., excluding particulate matter PM10 generated from

ground level sources from far field analyses because these heavier particles settle out of the air quickly).

- Andrew considered that the Powder River Basin would be the appropriate geographic area for the cumulative analysis because this area has experienced coal and coal bed methane development and currently is a hot bed for oil and gas development
- Andrew suggested an information source for air quality cumulative effects beyond the 2020 timeframe would be the BLM Lease-Buy Application supporting documents. Andrew mentioned that other WDEQ staff is more familiar with these documents.
- Andrew was not aware of any pending or expected changes to either the NAAQS attainment status within Wyoming or the WAAQS. Andrew mentioned that changes to the federal NAAQS for ozone could have implications for the Powder River Basin.
- Andrew suggested that Air Quality Division Monitoring Section staff would be the best source for WDEQ's perspective on the appropriate baseline ambient air concentrations for each criteria pollutant for the proposed Reno Creek site. Andrew volunteered to provide Jill contact information for Cara Keslar to follow up on this topic.

Should the summary in this email need correction or modification, please let me know at your earliest convenience.

Best,

Jill Caverly

**Jill S. Caverly, PE**

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