

Thank you for your comment, Jim DiLeo.

The comment tracking number that has been assigned to your comment is OST2012D50071.

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OSTS 2012 Draft PEIS

Comment ID: OST2012D50071

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Attachment: TSP Oil shale-tar sands 4-4-12 comments.docx

Comment Submitted:

**Colorado Department Of Public Health & Environment
Air Pollution Control Division
Technical Services Program
Modeling, Meteorology, and Emission Inventory Unit**

Technical Memorandum

To: Jim Dileo
From: Kevin Briggs
CC: Chuck Machovec, Daniel Bon, Dale Wells
Date: April 4, 2012
Subject: **Comments on :** Draft Programmatic Environmental Impact Statement and Possible Land Use Plan Amendments for Allocation of Oil Shale and Tar Sands Resources on Lands Administered by the Bureau of Land Management in Colorado, Utah, and Wyoming- January 2012

In Volume 2, Chapters 4 and 5, page 4-52, lines 32-38, the Draft PEIS states that

“It is not possible to predict site-specific air quality impacts until actual oil shale projects are proposed and designed. Once such a proposal is presented, impacts on these resources would be further considered in project-specific NEPA evaluations and through consultations with the BLM prior to actual development. As additional NEPA analysis is done for leasing and site specific development, it may be necessary as part of the air quality analysis to conduct air quality modeling. The types of modeling that may be performed, when warranted, include near-field modeling, far-field modeling, and photo-chemical grid modeling.”

Comment:

As the RD&D projects are expanded from 160-acres to commercial leases, it is expected that local and cumulative air quality resources will be effected as stated throughout the documents. Prior to doing any NEPA analysis, an air quality modeling protocol needs to be submitted to reviewing agencies, including CDPHE, describing how near-field, far-field transport modeling and photochemical grid modeling will be performed for oil shale/tar sand development in order to reach an understanding of how the air quality impact analysis will be conducted.

In addition, given the uncertainty in actual oil shale projects that may be proposed, the magnitude of development and how those projects might be

designed, it is imperative that base line air quality be determined through a robust monitoring network prior to construction. The monitoring network should be constructed in a way to provide year-round characterization of existing air quality levels, improve the accuracy of modeling, and to improve the ability of CDPHE to issue air quality advisories to the general public if warranted by monitored conditions. It is recommended that BLM work with the State of Colorado to establish an air quality monitoring fund (or another method) to expand the existing air quality monitoring networks as deemed appropriate by CDPHE to gather meteorological and air quality data at micro, local, and regional scales for these projects. Funding levels should be sufficient to include AQRV/visibility monitoring at potentially affected mandatory federal Class I areas such as the Rocky Mountain National Park and the Flat Tops Wilderness Area. Funding should also be sufficient in order to provide and establish long term air quality monitoring throughout the project's lifetime. CDPHE also recommends that such a funding source be flexible enough to allow for future monitoring to include HAPS (such as carbonyl compounds), speciated VOCs (especially BTEX) and greenhouse gases (especially methane). Monitoring of these types of emissions are notably absent in the oil and gas development areas of western Colorado. It is recommended that the private sector proponents of oil and gas development fund the regulatory monitoring network enhancements.