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## APPENDIX 4—AIR QUALITY IMPACT TECHNICAL SUPPORT DOCUMENT

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The following technical support document describes the processes used to conduct the air quality impact assessment for the air resources in the Rawlins Resource Management Plan Planning Area (RMPPA), and provides summaries of relevant analysis data. The contents of this document are as follows:

- Regulatory Framework
- Agency Roles and Authorities
- Existing Air Quality
- Air Quality Impact Analysis
- Emission Calculations
- Internet Resources
- Mitigation.

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### REGULATORY FRAMEWORK

For quantitative analysis, the following air quality criteria apply. Although criteria listed below do not apply to the qualitative analysis presented in the Rawlins Air Quality Analysis, they are identified here for reference purposes. The basic framework for controlling air pollutants in the United States is mandated by the 1970 Clean Air Act (CAA) and its amendments, and the 1999 Regional Haze Regulations. The CAA addresses criteria air pollutants, state and national ambient air quality standards for criteria air pollutants, and the Prevention of Significant Deterioration program. The Regional Haze Regulations address visibility impairment.

### Ambient Air Quality Constituents

Air pollutants addressed in this study include criteria pollutants; hazardous air pollutants (HAP); and sulfur and nitrogen compounds, which could cause visibility impairment or atmospheric deposition impacts.

### Criteria Pollutants

The National Ambient Air Quality Standards (NAAQS) are established by the Environmental Protection Agency (EPA) to protect human health and are designed to protect the most sensitive portion of the population. These standards are reviewed every 5 years and undergo extensive peer review and public comment. The NAAQS specify the maximum concentration level, the averaging time or exposure time,

and a statistical form of the standard that defines when an exceedance would occur. Criteria pollutants include carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>), and lead (Pb).

- **Carbon Monoxide.** CO is an odorless, colorless gas formed during any combustion process, such as operation of engines, fireplaces, and furnaces. High concentrations of CO affect the oxygen-carrying capacity of the blood and can lead to unconsciousness and asphyxiation. Wildland fires are natural sources of CO.
- **Nitrogen Dioxide.** NO<sub>2</sub> is a red-brown gas formed during operation of internal combustion engines. Such engines emit a mixture of nitrogen gases, collectively called nitrogen oxides (NO<sub>x</sub>). Internal combustion engines emit primarily NO which, in the presence of ambient ozone, forms NO<sub>2</sub> (the regulated pollutant); NO<sub>2</sub> at high concentration can contribute to formation of a brown cloud. NO<sub>2</sub> in the presence of ammonia can form a particulate nitrate as well as nitric acid.
- **Sulfur Dioxide.** SO<sub>2</sub> forms during combustion from trace levels of sulfur in coal or diesel fuel. It can convert to ammonium sulfate ((NH<sub>4</sub>)<sub>2</sub>SO<sub>4</sub>) and sulfuric acid (H<sub>2</sub>SO<sub>4</sub>), which can cause visibility impairment and acid rain. Volcanoes are natural sources of SO<sub>2</sub>. Anthropogenic sources include refineries and power plants.
- **Ozone.** Ozone (O<sub>3</sub>) is not emitted directly into the air, but is created by chemical reactions between oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOC) in the presence of sunlight. Sources of NO<sub>x</sub> and VOC include industrial facilities and electric utilities, motor vehicle exhaust, gasoline vapors, and chemical solvents. The faint acrid smell common after thunderstorms is caused by O<sub>3</sub> formation by lightning. Ozone is a strong oxidizing chemical that can burn lungs and eyes and damage plants at high concentrations.
- **Particulate Matter.** Particulate matter (e.g., soil particles and pollen) is essentially small particles suspended in the air that settle to the ground slowly and may be re-suspended if disturbed. Separate allowable concentration levels for particulate matter are based on the relative size of the particle:
  - PM<sub>10</sub> particles, particles with diameters of less than 10 micrometers, are small enough to be inhaled and can cause adverse health effects.
  - PM<sub>2.5</sub> particles, particles with diameters of less than 2.5 micrometers, are so small that they can be drawn deeply into the lungs and cause serious health problems. Particles in this size range are also the main cause of visibility impairment.
- **Lead.** Before use of unleaded fuel for automobiles became widespread, lead particles were emitted from automobile tailpipes. Lead is not considered in this environmental impact statement (EIS) because no proposed projects are expected to emit lead. The lead standard also will not be addressed in this Technical Support Document because lead is not a current concern, but it will be considered in future projects.

## Hazardous Air Pollutants

There are a wide variety of HAPs, including N-hexane, ethylbenzene, toluene, xylene, formaldehyde, and benzene. Although HAPs do not have regulatory ambient air quality standards, the U.S. Environmental Protection Agency (EPA) has issued reference concentrations for evaluating the inhalation risk for cancerous and noncancerous health effects, known as Reference Concentrations for Chronic Inhalation (RfC).

The EIS associated with the Rawlins Resource Management Plan (RMP) is a National Environmental Policy Act (NEPA) document and not a regulatory document, but the Record of Decision is binding and a “public record” (40 CFR 1505.2). Any project will be required to obtain an air quality pre-construction permit for permanent emission sources from Wyoming Department of Environmental Quality (WDEQ) before construction can begin. As part of the pre-construction process, sources must comply with applicable Maximum Achievable Control Technology (MACT) regulations for HAPs (Section 112 programs, specifically Section 112[g] case-by-case MACT determinations based on 40 Code of Federal Regulations [CFR] Part 63, Subpart B and Section 112[d] MACT emission standards). In addition, WDEQ has a Best Available Control Technology (BACT) requirement that is applicable to minor sources of HAPs.

Any source that emits or has the potential to emit 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs is considered a major source and will require a Title V, Part 70, operating permit review and permit. This may include either a case-by-case 112(g) MACT determination, if the source is new or has had major modifications and no applicable MACT emission standard has been promulgated, or compliance with an applicable MACT emission standard. Some of the specific regulations that apply in the Rawlins RMPPA include 40 CFR Part 63 Subpart HH, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities; 40 CFR Part 63 Subpart HHH, National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities; and 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This last regulation, new in 2004, affects source categories using reciprocating engines for gas compression. The aforementioned MACT standards reflect some, but not all, of those in existence at the time this RMP was prepared. Additional MACT standards will be promulgated in the future that may also apply to sources in the RMPPA.

For quantifiable analysis, short-term (1-hour) HAP concentrations would be compared to acute Reference Exposure Levels (REL). RELs are defined as concentrations at or below which no adverse health effects are expected. If no RELs were available for ethylbenzene and n-hexane, the available Immediately Dangerous to Life or Health (IDLH) values would be used. These IDLH values are determined by the National Institute for Occupational Safety and Health (NIOSH) and would be obtained from EPA’s Air Toxics Database.

For quantifiable analysis, long-term exposure to HAPs emitted by the Proposed RMP would be compared to RfCs. An RfC is defined by EPA as the daily inhalation concentration at which no long-term adverse health effects are expected. RfCs exist for both noncarcinogenic and carcinogenic effects on human health. Annual modeled HAP concentrations for all HAPs emitted would be compared directly to the noncarcinogenic RfCs. RfCs for the suspected carcinogens benzene and formaldehyde are expressed as risk factors. Accepted methods of risk assessment would be used to evaluate the incremental cancer risk from these pollutants.

Potential cancer risks would be compared against the generally accepted cancer risk in the range of  $1 \times 10^{-6}$  to  $1 \times 10^{-4}$ , presented in the Superfund National Oil and Hazardous Substances Pollution Contingency Plan (EPA 1990), Residual Risk Report to Congress (EPA 1999).

Annual modeled concentrations would be multiplied by EPA’s unit risk factors (URF) (based on 70-year exposure) for those pollutants, and then the product would be multiplied by an adjustment factor, which represents the ratio of projected exposure time to 70 years. The adjustment factors represent two scenarios: a most likely exposure (MLE) scenario and one reflective of the maximally exposed individual (MEI).

The MLE duration would be assumed to be 9 years, which corresponds to the mean duration that a family remains at a residence. This duration corresponds to an adjustment factor of  $9/70 = 0.13$ . The duration of exposure for the MEI is assumed to be 50 years (i.e., the Life of Project [LOP]), corresponding to an adjustment factor of  $50/70 = 0.71$ .

A second adjustment would be made for time spent at home versus time spent elsewhere. For the MLE scenario, the at-home time fraction is 0.64 (EPA 1993), and it would be assumed that during the rest of the day the individual remained in an area where annual HAP concentrations were one quarter as high as the maximum annual average concentration. Therefore, the MLE adjustment factor would be  $(0.13) \times [(0.64 \times 1.0) + (0.36 \times 0.25)] = 0.0949$ . The MEI scenario would assume that the individual was at home 100 percent of the time, for a final adjustment factor of  $(0.71 \times 1.0) = 0.71$ .

HAP emissions are associated with industrial activities, such as oil and gas operations, refineries, paint shops, dry cleaning facilities, and wood working shops.

Because this analysis is qualitative, no specific analysis of either short- or long-term HAP impacts is made.

HAP emissions in the RMPPA are expected to be similar to those found in the Desolation Flats EIS and comprise of benzene, toluene, ethylbenzene, xylene, n-hexane, and formaldehyde.

### Atmospheric Deposition Constituents

Sulfur and nitrogen compounds that can be deposited in terrestrial and aquatic ecosystems include nitric acid ( $\text{HNO}_3$ ), nitrate ( $\text{NO}_3^-$ ), ammonium ( $\text{NH}_4^+$ ), and sulfate ( $\text{SO}_4^-$ ).

Total nitrogen and sulfur deposition is calculated from dry deposition CASTNet data and wet deposition NADP data. Total deposition data are then compared to thresholds developed by the Forest Service (USFS) (Fox et al. 1989) as follows:

$$\text{Total N dep} = \text{N/NO}_3^- \text{ dry} + \text{N/NH}_4^+ \text{ dry} + \text{N/HNO}_3 \text{ dry} + \text{N/NO}_3^- \text{ wet} + \text{N/NH}_4^+ \text{ wet}$$

Where

$$\text{N/NO}_3^- \text{ dry} = \text{NO}_3^- * (7/31)$$

$$\text{N/NH}_4^+ \text{ dry} = \text{NH}_4^+ * (7/11)$$

$$\text{N/HNO}_3 \text{ dry} = \text{HNO}_3 * (7/32)$$

$$\text{N/NO}_3^- \text{ wet} = \text{NO}_3^- * (7/31)$$

$$\text{N/NH}_4^+ \text{ wet} = \text{NH}_4^+ * (7/11)$$

$$\text{Total S dep} = \text{S/SO}_2 \text{ dry} + \text{S/SO}_4^- \text{ dry} + \text{S/SO}_4^- \text{ wet}$$

Where

$$\text{S/SO}_2 \text{ dry} = \text{SO}_2 * (16/32)$$

$$\text{S/SO}_4^- \text{ dry} = \text{SO}_4^{2-} * (16/48)$$

$$\text{S/SO}_4^- \text{ wet} = \text{SO}_4^{2-} * (16/48)$$

Nitric acid ( $\text{HNO}_3$ ), and nitrate ( $\text{NO}_3^-$ ) are not emitted directly into the air but form in the atmosphere from industrial and automotive emissions of  $\text{NO}_x$ . Sulfate ( $\text{SO}_4^-$ ) is formed in the atmosphere from industrial emission of sulfur dioxide ( $\text{SO}_2$ ). Deposition of  $\text{HNO}_3$ ,  $\text{NO}_3^-$ , and  $\text{SO}_4^-$  can adversely affect plant growth, soil chemistry, lichens, aquatic environments, and petroglyphs. Anthropogenic ammonium ( $\text{NH}_4^+$ ) is primarily associated with feedlots and agricultural fertilization. Deposition of  $\text{NH}_4^+$  can affect

terrestrial and aquatic vegetation. Although deposition may be beneficial as a fertilizer, it can adversely affect the timing of plant growth and dormancy.

Although this analysis will be qualitative, future specific projects will require quantitative analyses using the following criteria.

## Wyoming and National Ambient Air Quality Standards

Wyoming Ambient Air Quality Standards (WAAQS) and National Ambient Air Quality Standards (NAAQS) are health-based standards for the maximum concentration of air pollutants at all locations to which the public has access. The WAAQS and NAAQS are legally enforceable standards. Concentrations above the WAAQS and NAAQS represent a risk to human health. State standards must be as strict as, or more strict than, federal standards. The NAAQS are established by EPA to protect human health and are designed to protect the most sensitive portion of the population. These standards are reviewed every 5 years and undergo extensive peer review and public comment. The NAAQS specify the maximum concentration level, the averaging time or exposure time, and a statistical form of the standard that defines when an exceedance would occur.

EPA has developed standards for each criteria pollutant for a specific averaging time (Table A4-1). Short averaging times (1, 3, 8, and 24 hours) address short-term exposure, while the annual standards address long-term exposure. Longer term standards are set to lower allowable concentrations than are short-term standards to recognize the cumulative effects of long-term exposure.

## Prevention of Significant Deterioration

The goal of the Prevention of Significant Deterioration (PSD) program is to ensure that air quality in areas with clean air does not significantly deteriorate, while maintaining a margin for future industrial growth. Under PSD, each area in the United States is classified by the air quality in that region according to the following system:

- **PSD Class I Areas.** Areas with pristine air quality, such as wilderness areas, national parks, and some Indian reservations, are accorded the strictest protection. Only very small incremental increases in pollutant concentrations are allowed in order to maintain the very clean air quality in these areas. PSD Class I Areas are mandatory areas designated by Congress for protection and preservation.
- **PSD Class II Areas.** Essentially, all areas that are not designated as Class I are designated as Class II. Moderate incremental increases in pollutant concentrations are allowed, although the concentrations are not allowed to reach the concentrations set by Wyoming and federal standards (WAAQS and NAAQS).
- **PSD Class III Areas.** No areas have yet been designated as Class III. Concentrations would be allowed to increase all the way to the WAAQS and NAAQS.

The incremental increases allowed for specific pollutants in Class I and Class II areas are provided in Table A4-2.

Comparisons of potential PM<sub>10</sub>, NO<sub>2</sub>, and SO<sub>2</sub> concentrations with PSD increments are intended only to evaluate a threshold of concern and do not represent a regulatory PSD increment consumption analysis. Regulatory PSD increment consumption analyses are solely the responsibility of the State of Wyoming, which has been granted primacy (with EPA oversight) under the CAA.

## Regional Haze Regulations

Visibility impairment in the form of regional haze obscures the clarity, color, texture, and form of what we see. Haze-causing pollutants (mostly fine particles) are directly emitted into the atmosphere or are formed when gases emitted into the air form particles as they are carried downwind. Emissions from human-caused and natural sources can be carried great distances, contributing to regional haze. The WDEQ Air Quality Division (WDEQ-AQD) submitted its Regional Haze State Implementation Plan (SIP) in accordance with 40 CFR, Part 51.309, in December 2003. EPA has not yet taken action on this SIP.

Visual range, one of several ways to express visibility, is the furthest distance at which a person can distinguish a dark landscape feature from a light background like the sky. Without human-caused visibility impairment, natural visual range is estimated to average about 110–115 miles in the western United States and 60–80 miles in the eastern United States (Malm 1999).

The Regional Haze Regulations, which apply only to PSD Class I Areas, were developed by EPA in response to the CAA Amendments of 1977 and 1990. They are intended to maintain visibility on the least impaired days and to improve visibility on the most impaired days in mandatory federal Class I areas across the United States so that visibility in these areas is returned to natural conditions by the year 2064. These regulations require states to submit a regional haze SIP and progress reports to demonstrate reasonable progress toward the 2064 goal.

**Table A4-1. National and Wyoming Ambient Air Quality Standards**

Pollutant	Averaging Time	NAAQS			WAAQS		
		( $\mu\text{g}/\text{m}^3$ )	(ppm)	(ppb)	( $\mu\text{g}/\text{m}^3$ )	(ppm)	(ppb)
Carbon Monoxide CO	1 hour	40,000	35	35,000	40,000	35	35,000
	8 hour	10,000	9	9,000	10,000	9	9,000
Lead Pb	Calendar quarter	1.5			1.5		
Nitrogen Dioxide NO <sub>2</sub>	Annual	100	.053	53	100	.053	53
Ozone O <sub>3</sub>	8 hour	157	.08	80	157	.08	80
Particulate Matter PM <sub>10</sub>	24 hour	150			150		
	Annual	NA <sup>a</sup>			50 <sup>a</sup>		
Particulate Matter PM <sub>2.5</sub>	24 hour	35 <sup>a</sup>			65 <sup>a</sup>		
	Annual	15			15		
Sulfur Dioxide SO <sub>2</sub>	3 hour	1,300	.5	500	695	.266	266
	24 hour	365	.14	140	260	.099	99
	Annual	80	.030	30	60	.023	23

Pollutant	Averaging Time	NAAQS			WAAQS		
		( $\mu\text{g}/\text{m}^3$ )	(ppm)	(ppb)	( $\mu\text{g}/\text{m}^3$ )	(ppm)	(ppb)

<sup>a</sup> On September 21, 2006, EPA announced final revisions to the NAAQS for particulate matter, which were published in the *Federal Register* on October 17, 2006, and take effect on December 18, 2006. The revision strengthens the 24-hour  $\text{PM}_{2.5}$  standard from 65–35  $\mu\text{g}/\text{m}^3$  and revokes the annual  $\text{PM}_{10}$  standard of 50  $\mu\text{g}/\text{m}^3$ . EPA retained the existing annual  $\text{PM}_{2.5}$  standard of 15  $\mu\text{g}/\text{m}^3$  and the 24-hour  $\text{PM}_{10}$  standard of 150  $\mu\text{g}/\text{m}^3$ . After the final rule becomes effective, the State of Wyoming will enter into rulemaking to revise the WAAQS.

Table A4-2. PSD Increments

Pollutant	Averaging Time	PSD Increment					
		Class I			Class II		
		( $\mu\text{g}/\text{m}^3$ )	(ppm)	(ppb)	( $\mu\text{g}/\text{m}^3$ )	(ppm)	(ppb)
Nitrogen Dioxide $\text{NO}_2$	Annual	2.5	.0013	1.3	25	.013	13
Particulate Matter $\text{PM}_{10}$	24 hour	8			30		
	Annual	4			17		
Sulfur Dioxide $\text{SO}_2$	3 hour	25	.0096	9.6	512	.1956	196
	24 hour	5	.0019	1.9	91	.0348	35
	Annual	2	.0008	.8	20	.0076	8

## APPLICABILITY TO THE RAWLINS AREA

Air pollution impacts are limited by local, state, tribal, and federal air quality regulations, standards, and implementation plans established under the CAA and administered by the WDEQ-AQD with oversight from EPA. Air quality regulations require that proposed new, or modified existing, air pollutant emission stationary sources (including oil and gas compression facilities) undergo a permitting review before their construction can begin. Therefore, the WDEQ-AQD has the primary authority and responsibility to review permit applications and to require emission permits, fees, and control devices, before construction or start of operation. New Source Review does not apply to mobile sources, such as drilling rigs.

Fugitive dust and exhaust from construction activities, along with air pollutants emitted during operation (e.g., well operations, booster [field] and pipeline [sales] compressor engines), are potential causes of air quality impacts. These issues are more likely to generate public concern where natural gas development activities occur near residential areas or near sensitive Class I and Class II areas.

The USFS, the National Park Service (NPS), and the Fish and Wildlife Service (FWS) have also expressed concerns about potential atmospheric deposition (acid rain) and visibility impacts within downwind PSD Class I and PSD Class II sensitive areas under their administration, located throughout Wyoming.

The NAAQS and the WAAQS are health-based standards for the maximum acceptable concentrations of air pollutants at locations to which the public has access. The analysis of the Proposed RMP must demonstrate continued compliance with all applicable local, state, tribal, and federal air quality standards. Existing air quality throughout the project area is in attainment of all ambient air quality standards, as demonstrated by the relatively low concentration levels presented in Table A4-3.

Air quality regulations require that stationary proposed new, or modified existing air pollutant emission sources (including oil and gas compression facilities) undergo a permitting review before their construction can begin. Therefore, the WDEQ-AQD has been given primary authority over and responsibility for reviewing permit applications and for requiring emission permits, fees, and control devices, before construction and/or operation. In addition, the U.S. Congress (through the CAA Section 116) authorized local, state, and tribal air quality regulatory agencies to establish air pollution control requirements more (but not less) stringent than federal requirements. Also, under both the Federal Land Policy and Management Act (FLPMA) and the CAA, BLM cannot authorize any activity that would not conform to all applicable local, state, tribal, and federal air quality laws, regulations, standards, and implementation plans.

Given the project area's current attainment status, future development projects that have the potential to emit more than 250 tons per year of any criteria pollutant (or certain listed sources that have the potential to emit more than 100 tons per year) would be required to undergo a site-specific regulatory PSD increment consumption analysis under the federal New Source Review permitting regulations. Development projects that require PSD permits may also be required by the applicable air quality regulatory agencies to incorporate additional emission control measures (including a Best Available Control Technology [BACT] analysis and determination) to ensure protection of air quality resources and to demonstrate that the combined impacts of all PSD sources will not exceed the allowable incremental air quality impacts for NO<sub>2</sub>, PM<sub>10</sub>, and SO<sub>2</sub>. Minor sources having emissions below the cutoff rates mentioned above do not require PSD permits; nevertheless, their emissions consume increment.

A regulatory PSD increment consumption analysis may be conducted, either as part of a New Source Review or independently. The determination of PSD increment consumption is a legal responsibility of the applicable air quality regulatory agencies, with EPA oversight. In addition, an analysis of cumulative impacts due to all existing sources and the permit applicant's sources is required during New Source Review to demonstrate that applicable ambient air quality standards will be met during the operational lifetime of the permit applicant's operations.

Sources subject to the PSD permit review procedure are also required to demonstrate potential impacts on air quality-related values (AQRV). These include visibility impacts, degradation of mountain lakes due to atmospheric deposition (acid rain), and effects on sensitive flora and fauna in Class I areas. The CAA also provides specific visibility protection procedures for the mandatory federal Class I areas designated by the U.S. Congress on August 7, 1977, which included wilderness areas greater than 5,000 acres in size, as well as national parks and national memorial parks greater than 6,000 acres in size as of that date.

## **AGENCY ROLES AND AUTHORITIES**

### **EPA**

EPA administers the Federal CAA (42 U.S. Code [U.S.C.] 7401, et seq.) to maintain the NAAQS that protect human health and to preserve the rural air quality in the region by ensuring the PSD Class I and Class II increments for SO<sub>2</sub>, NO<sub>2</sub>, and PM<sub>10</sub>, are not exceeded. EPA has delegated this CAA authority to the State of Wyoming.

### **Wyoming DEQ**

Wyoming regulates pollutants emitted into the air through the Wyoming Environmental Quality Act (W.S. 35-11-101 et seq.). Wyoming is also authorized by an approved SIP to administer all requirements of the PSD permit program under the CAA. In addition, the approved Wyoming SIP contains a number of

programs that provide for the implementation, maintenance, and enforcement of the NAAQS, including a New Source Review program for minor source permitting that requires, among other things, application of BACT for all new or modified sources, regardless of size or source category. Included as well are authorities for the control of particulate emissions, including fugitive particulate emissions from haul roads, access roads, or general facility boundaries. Wyoming is also delegated responsibility for operating an approved ambient air quality monitoring network for the purpose of demonstrating compliance with the NAAQS and the WAAQS.

## **Bureau of Land Management**

NEPA requires that federal agencies consider mitigation of direct, indirect, and cumulative impacts during their preparation of an EIS (BLM Land Use Planning Manual 1601). Under the CAA, federal agencies are to comply with SIPs regarding the control and abatement of air pollution. Before approval of RMPs or amendments to RMPs, the BLM State Director is to submit any known inconsistencies with SIPs to the governor of that state. If the governor of the state recommends changes in the Proposed RMP or amendment to meet SIP requirements, the State Director shall give the public an opportunity to comment on those recommendations (BLM Land Use Planning Manual, Section 1610.3-2).

## **Forest Service**

The USFS administers national forests, which include several wilderness areas (WA) which could have direct effects associated with the project: Bridger WA, Fitzpatrick WA, Rawah WA, and Mount Zirkel WA, all of which have mandatory federal Class I designation. In addition, Washakie, Teton, and Savage Run WAs and the Class II Popo Agie must be included in the RMPPA analysis. As federal land managers, the USFS could act in a consultative role to recommend that BLM impact analysis results, or any future EPA- or state-administered PSD refined impact analysis results (if justified), trigger adverse impairment status. If the USFS determines impairment of WAs, BLM, the state, and/or EPA might need to mitigate this predicted adverse air quality effect.

## **National Park Service**

One area administered by the NPS with a mandatory federal Class I area designation, Rocky Mountain National Park, could be affected by direct effects associated with the Rawlins Field Office (RFO) BLM emissions. As federal land managers, the NPS could act in a consultative role to recommend that BLM impact analysis results, or any future EPA- or state-administered PSD refined impact analysis results (if justified), trigger adverse impairment status. If the NPS determines impairment of NPS-administered Class I areas, BLM, the state, and/or EPA might need to mitigate this predicted adverse air quality effect.

## **EXISTING AIR QUALITY**

Specific air quality monitoring is not conducted throughout most of the project area, but air quality conditions are likely to be very good, as characterized by limited air pollution emission sources (few industrial facilities and residential emissions in the relatively small communities and isolated ranches) and good atmospheric dispersion conditions, resulting in relatively low air pollutant concentrations. Table A4-3 summarizes the ambient air quality background concentrations in the RMPPA. This information was provided by WDEQ. Although monitoring is primarily conducted in urban or industrial areas, the data selected are considered to be the best available representation of background air pollutant concentrations throughout the project area. The assumed background pollutant concentrations are below applicable ambient air quality standards for all pollutants and averaging times (although ozone levels approach the

standards). These national and Wyoming standards, and PSD increment values, are also presented in Table A4-1 and Table A4-2.

**Table A4-3. Assumed Background Concentrations and Applicable Ambient Air Quality Standards and PSD Increment Values (in  $\mu\text{g}/\text{m}^3$ )**

Pollutant/ Averaging Time	Measured Background Concentration ( $\mu\text{g}/\text{m}^3$ )	Percent of Standards (%)		Data Source
		NAAQS	WAAQS	
<b>Carbon Monoxide (CO)</b>				
8-hour	1,381	14	14	Data collected by Amoco at Ryckman Creek for an 8-month period during 1978–1979, summarized in the Riley Ridge EIS (USDI, BLM 1983).
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>				
Annual	3.4	3	3	Data collected at Green River Basin Visibility Study site, Green River, WY, during January–December 2001 (ARS 2002)
<b>Ozone (O<sub>3</sub>)</b>				
1-hour	169	72	72	Data collected at Green River Basin Visibility Study site, Green River, WY, during June 10, 1998–December 31, 2001(ARS 2002)
8-hour	147	94	94	
<b>Particulate Matter (PM<sub>10</sub>)</b>				
24-hour	47	31	31	Data collected by WDEQ at Emerson Building, Cheyenne, WY, 2002 (WDEQ)
Annual	16 <sup>a</sup>	NA <sup>a</sup>	32	
<b>Particulate Matter (PM<sub>2.5</sub>)</b>				
24-hour	15 <sup>b</sup>	42	23	Data collected by WDEQ at Emerson Building, Cheyenne, WY, 2002 (WDEQ)
Annual	5	33	33	
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>				
3-hour	132	10	19	Data collected at LaBarge Study Area at the Northwest Pipeline Craven Creek site, 1982–1983
24-hour	43	12	17	
Annual	9	11	15	

<sup>a</sup> On September 21, 2006, EPA announced final revisions to the NAAQS for particulate matter, which were published in the *Federal Register* on October 17, 2006, and take effect on December 18, 2006. The revision strengthens the 24-hour PM<sub>2.5</sub> standard from 65–35  $\mu\text{g}/\text{m}^3$  and revokes the annual PM<sub>10</sub> standard of 50  $\mu\text{g}/\text{m}^3$ . EPA retained the existing annual PM<sub>2.5</sub> standard of 15  $\mu\text{g}/\text{m}^3$  and the 24-hour PM<sub>10</sub> standard of 150  $\mu\text{g}/\text{m}^3$ . After the final rule becomes effective, the State of Wyoming will enter into rulemaking to revise the WAAQS.

<sup>b</sup> 15  $\mu\text{g}/\text{m}^3$  is the first maximum concentration of PM<sub>2.5</sub>.

Data provided by the WDEQ-AQD

Note:  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter

## Air Quality Impact Assessment

A qualitative emission comparison approach was used because of (1) lack of specific project information on location, types, and magnitude of potential projects, and (2) time constraints in completing the analysis.

Emissions calculations were based on the best available engineering data and assumptions; air, visibility, and atmospheric deposition data; and emission inventory procedures, as well as on professional and scientific judgment. However, where specific data or procedures were not available, assumptions were incorporated.

Maximum potential near-field particulate matter emissions from traffic on unpaved roads and during well pad construction were used to estimate emissions for PM<sub>2.5</sub> and PM<sub>10</sub> impacts. Maximum air pollutant emissions from each oil and gas well would be temporary (i.e., occurring during an average of a 12-day construction period) and would occur in isolation, without significantly interacting with adjacent well locations. Particulate matter emissions from well pad and resource road construction would be minimized by application of water and/or chemical dust suppressants. The control efficiency of these dust suppressants was computed at 50 percent during construction. During well completion testing, natural gas could be burned (flared) on an average of 2 days (refer to emission CD for details).

For any future projects, significance criteria for potential air quality impacts will include local, state, tribal, and federally enforced legal requirements to ensure that air pollutant concentrations remain within specific allowable levels. These requirements and legal limits are presented in Table A4-1. Because neither the WDEQ-AQD nor EPA has established ambient HAP standards, only emissions were calculated.

Because the potential air pollutant emission sources comprise many small sources spread out over a very large area, discrete visible plumes are not likely to impact the distant sensitive areas, but the potential for cumulative visibility impacts (increased regional haze) is a concern. Regional haze degradation is caused by fine particles and gases scattering and absorbing light. Potential changes to regional haze are calculated in terms of a perceptible “just noticeable change” (1.0 deciview [dv]) in visibility when compared to background conditions. A 1.0 dv change is considered potentially significant in mandatory federal PSD Class I areas as described in the EPA Regional Haze Regulations (40 CFR 51.300 et seq.), and as originally presented in Pitchford and Malm (1994). A 1.0 dv change is defined as about a 10 percent change in the extinction coefficient (corresponding to a 2–5 percent change in contrast, for a black target against a clear sky, at the most optically sensitive distance from an observer), which is a small but noticeable change in haziness under most circumstances when viewing scenes in mandatory federal Class I areas.

It should be noted that a 1.0 dv change is not a “just noticeable change” in all cases for all scenes. Visibility changes of less than 1.0 dv are likely to be perceptible in some cases, especially where the scene being viewed is highly sensitive to small amounts of pollution, as in the case of preferential forward light scattering. Under other view-specific conditions, such as where the sight path to a scenic feature is less than the maximum visual range, a change of greater than 1.0 dv might be required to produce a “just noticeable change.” However, any future project-specific NEPA analyses will not be designed to predict specific visibility impacts for specific views in specific mandatory federal Class I areas based on specific project designs but to characterize reasonably foreseeable visibility conditions that are representative of a fairly broad geographic region, based on emission source assumptions. This approach is consistent with both the nature of regional haze and the requirements of NEPA. At the time of a preconstruction air quality PSD permit review, the WDEQ-AQD may require a much more detailed visibility impact analysis. Factors such as the magnitude of change, frequency, time of year, and meteorological conditions

during times when predicted visibility impacts are above the 1.0 dv threshold (as well as inherent conservatism in the impact analyses) should all be considered in assessing the significance of predicted impacts.

The USFS, NPS, and FWS have published their *Final Federal Land Managers' Air Quality Related Values Work Group (FLAG) Phase I Report (Federal Register, Vol. 66, No. 2, January 3, 2001)*, providing "...a consistent and predictable process for assessing the impacts of new and existing sources on AQRVs..." including visibility. For example, the FLAG report states, "A cumulative effects analysis of new growth (defined as all PSD increment-consuming sources) on visibility impairment should be performed," and further, "If the visibility impairment from the proposed action, in combination with cumulative new source growth, is less than a change in extinction of 10% [1.0 dv] for all time periods, the FLMs will not likely object to the proposed action."

### **Estimation of Emission Factors**

For natural gas compressor engines, the emissions of nitrogen oxides, CO, and formaldehyde are determined by the average permitted emission rate allowed by the state under Best Available Control Technology (BACT) processes. For fugitive dust impacts, emission rates are obtained from EPA's *AP-42* document titled *A Compilation of Air Pollutant Emission Factors*. An *AP-42* emission factor is a representative value that attempts to relate the quantity of a pollutant released into the atmosphere with an activity associated with the release of that pollutant. Emission factors may be appropriate to use in a number of situations, such as in making source-specific emission estimates for areawide inventories. These inventories have many purposes, including ambient dispersion modeling and analysis, control strategy development, and screening sources for compliance investigations. In most cases, these factors are simply averages of all available data of acceptable quality and are generally assumed to be representative of long-term averages for all sources in a specific category.

### **Emission Assumptions**

When reviewing the emission inventory it is important to understand that assumptions were made regarding development. For example, there is uncertainty regarding ultimate development of energy resources (e.g., number of wells, equipment to be used, specific locations of wells).

For the qualitative emission comparison approach, the following assumptions were used:

- All emission sources were assumed to operate at their reasonably foreseeable maximum emission rates (as identified in the other resource sections of this document) simultaneously throughout the area. Given the number of sources included in this analysis, the co-probability of such a scenario actually occurring over an entire year (or even 24 hours) is small.
- In developing the emissions inventory, there is uncertainty regarding ultimate development (e.g., number of wells, equipment to be used, and specific locations). All proposed coalbed natural gas and conventional wells were assumed to be fully operational and to remain operating, except for normal well closures throughout the area (well numbers were provided by the BLM RMG Group).
- The emissions inventory uses peak years of construction and peak years of operation, which would not occur throughout the entire development region at the same time. However, it is possible that conditions close to this could occur in some isolated areas. Further, it is assumed that the maximum cumulative emissions will occur in the last year (2023) of the analysis.

- Mitigation measures are included in the emissions inventory that may not be achievable in all circumstances. However, actual mitigation actions decided on by the developers and local and state authorities may be greater or less than those assumed in the analysis. For example, maintaining a construction road speed limit of 15 miles per hour (mph) might be reasonable in a construction zone but difficult to enforce elsewhere. Full (100 percent) mitigation of fugitive dust from disturbed lands might not be achievable. Further, although 50 percent reduction in fugitive emissions is assumed based on construction road wetting on the unimproved access road to the pad and at the pad, this level of effectiveness is characterized as the maximum possible. Wetting was assumed for maintenance traffic.
- Induced or secondary growth related to increases in vehicle miles traveled (VMT) is not included in the emissions inventory. Only activities directly related to BLM actions are considered.

The major assumptions used in developing the emissions calculations are as follows:

- Except for those emission factors that have been lowered through the WDEQ-AQD BACT requirements, EPA-recommended emission factors (AP-42) are appropriate for all activities.
- The base year is 2003.
- Activity factors (or the quantification of activity for each resource area as provided by the RFO) are appropriate for the base year and future time frames.
- Any anticipated recreational growth would follow growth trends for Wyoming over the past 10 years.
- For the qualitative analysis, only emissions from RFO BLM-administered activities are included. (For the cumulative analysis, emissions calculated by TRC are included for other federal and nonfederal actions throughout the state.)
- Criteria pollutants and HAPs are included in the calculations.
- Coal mining activity is 1.2 million tons per year production, and coal activity will cease in the year 2004.
- No trona mining activity occurs on RFO BLM land.

Emissions were calculated for the following activities: coalbed natural gas (CBNG), coal mining, lands and realty, livestock grazing, off-highway vehicles (OHV), resource roads, common variety minerals, vegetation, forest management, fire, and natural gas development. Activities related to weed control, wildlife and fisheries, and wild horses are assumed to be insignificant sources of air emissions.

A qualitative emission comparison approach was selected for this RMP air quality analysis. This approach was used because (1) sufficient specific data were not available on future projects, (2) there was limited time available to complete the analysis, (3) as projects are defined quantitative analysis will be required, and (4) WDEQ-AQD will require demonstration of compliance for any future specific projects. There are limitations associated with this approach. However, given the uncertainties concerning the number, nature, and specific location of future sources and activities, the emission comparison approach is defensible and provides a sound basis for analysis.

It is important to note that before actual development could occur, the applicable air quality regulatory agencies (including the state, tribe, or EPA) would review specific air pollutant emissions preconstruction permit applications that examine potential project-specific air quality impacts. As part of these permit

reviews (depending on source size), the air quality regulatory agencies could require additional air quality impact analyses or mitigation measures. Thus, before development occurred, additional site-specific air quality analyses would be performed to ensure protection of air quality. Federal land managers would require a demonstration that potential impacts from proposed projects would not adversely impact AQRV (including visibility) in sensitive Class I and Class II areas.

## Emissions Calculations

### Emissions for All Activities Except Fire

Summary emission inventories for each of the BLM activities for the base year short-term and long-term scenarios are found in Section 4.2, Air Quality Impact Assessment of the Proposed RMP/Final EIS. These emissions were calculated from data provided by the RFO and used best available information, BACT, AP-42, and the emission studies from other BLM documents.

The numbers of oil and gas wells estimated are provided by the RFO and are shown in Table A4-4. (This table accounts for net wells in operation and subtracts wells that are abandoned.)

**Table A4-4. Numbers of Oil and Gas Wells for the Rawlins Field Office**

Well Type	Existing Wells Through 2003	2008 Operational Wells	2023 Operational Wells
Coalbed Natural Gas (development)	62	907	3,474
Coalbed Natural Gas (exploratory)	7	108	416
<b>Total CBNG Wells</b>	<b>69</b>	<b>1,015</b>	<b>3,890</b>
Natural Gas (development)	2,439	3,127	5,255
Natural Gas (exploratory)	182	251	470
<b>Total Conventional Gas Wells</b>	<b>2,621</b>	<b>3,378</b>	<b>5,725</b>
<b>Total Combined Wells</b>	<b>2,690</b>	<b>4,393</b>	<b>9,615</b>

Using the well numbers, individual tables of air emissions for all BLM activities were calculated in linked spreadsheets. These spreadsheets are available on an emissions CD.

Because oil and gas field activities consist of many phases (i.e., exploration, development, production, and closure), the components that need to be included in emission calculations are complex. To understand the elements and assumptions used in the emissions calculations in the emissions CD, the following summary is provided.

### Table of Contents for Emissions CD

A list of the detailed spreadsheets, including a short description of some of the spreadsheets, is included below. (A brief description of the contents is included in the first several titles of natural gas development to provide a roadmap of the titles for the other resource areas.) In addition, a gas process flow diagram is included as a .pdf file in the emissions CD.

#### Conventional Natural Gas—Exploratory, Development, and Operations

- Table ZZ—major oil and gas assumptions
- Assumptions—secondary level of assumptions

- Compressor Horsepower (HP) Estimates
- ng-pad const.-fugitive dust (conventional natural gas fugitive dust from construction)
- Well Field Gas Charac (well field gas characteristics)
- ng-pad const.-exhaust and flare-short (conventional natural gas construction traffic exhaust and flaring short term)
- ng-pad const.-exhaust and flare-long (conventional natural gas construction traffic exhaust and flaring long term)
- ng-commuting vehicular-fugitive dust-short (conventional natural gas fugitive dust from commuting vehicles short term)
- ng-commuting vehicular-fugitive dust-long
- ng-commuting vehicular-exhaust-short
- ng-commuting vehicular-exhaust-long
- ng-Operations-NG compress-short (natural gas operations compressors short term)
- ng-Operations-NG compress-long
- ng-Op NG Dehyd and Flash and Flare (VOC emissions natural gas operations dehydrators, flashing and flaring)
- ng-Ops-Dehyd and Sep-Heaters-short and long (natural gas operations dehydrator and separators heaters)
- ng-Ops-sta. visible-dust and exhaust-short (natural gas operation station visits vehicular emission short term)
- ng-Ops-sta. visible-dust and exhaust-long (natural gas operation station visits vehicular emission long term)
- ng-Ops-WO-dust and exhaust-short (natural gas well operations vehicular dust and exhaust short term)
- ng-Ops-WO-dust and exhaust-long2
- ng-Ops W and P visible-dust and exhaust-short (well and pipe station visits vehicular emissions)
- ng-Ops W and P visible-dust and exhaust-long
- ng-Road maint-dust and exhaust-short (road maintenance vehicular dust and exhaust short term)
- ng-Road maint-dust exhaust-long
- ng-Comp maint-dust and exhaust-short (compressor maintenance vehicular dust and exhaust short term)
- ng-Comp maint-dust and exhaust-long
- Tanks-Condensate and Loadout (emissions from tanks and truck loadout)
- ng-summary-criteria-short (summary of all natural gas emissions short term)
- Annual Summary 2008
- Annual Summary 2023
- ng-summary-criteria-long
- (Same analysis and tabs for Base Year as above for 2003).

#### **Coalbed Natural Gas—Exploratory, Development, and Operations**

- Table ZZ—major oil and gas assumptions
- Assumptions—secondary level of assumptions
- Compressor Horsepower (HP) Estimates
- cbng-pad const.-fugitive dust
- cbng Well Field Gas Charac-(well field gas characteristics)
- cbng-pad const. traffic-exhaust-short (heavy equipment and traffic exhaust short term)
- cbng-pad const. traffic-exhaust-long
- cbng-commuting vehicular-fugitive dust-short
- cbng-commuting vehicular-fugitive dust-long
- cbng-commuting vehicular-exhaust-short

- cbng-commuting vehicular-exhaust-long
- cbng-operations-NG compress-short
- cbng-operations-NG compress-long
- cbng Dehyd short and long-(dehydrators short and long term emissions)
- cbng-Ops-Sep-short and long (coalbed natural gas operational separators)
- cbng-Ops-sta. visits-dust and exhaust-short
- cbng-Ops-sta. visits-dust and exhaust-long
- cbng-Ops-WO-dust and exhaust-short
- cbng-Ops-WO-dust and exhaust-long
- cbng-Ops W and P visible-dust and exhaust-short- (well and pipe visits fugitive and vehicular emissions)
- cbng-Ops W and P visible-dust and exhaust-long
- cbng-Road maint-dust and exhaust-short
- cbng-Road maint-dust and exhaust-long
- cbng-Compress maint-dust and exhaust-short
- cbng-Compress maint-dust and exhaust-long
- CBNG Water Reinjection (coalbed natural gas water reinjection pumps short and long)
- cbng-summary-criteria-short
- Annual NG Emissions 2008
- Annual NG Emissions 2023
- cbng-summary-criteria-long
- (Same analysis and tabs for Base Year 2003 as above).

#### **Coal Development**

- Coal emissions

#### **Lands and Realty**

- L and R-heavy equip-dust-short and long
- L and R-heavy equip-exhaust-short and long
- L and R-Commuting-Fugitive Dust-short
- L and R-Commuting-Fugitive Dust-long
- L and R-Commuting-exhaust-short
- L and R-Commuting-exhaust-long
- Summary-short
- Summary-long.

#### **Livestock Grazing**

- LG-heavyequip-dust-short and long
- LG-heavyequip-exhaust-short and long
- LG-Commuting-Fugitive Dust-shortunpav
- LG-Commuting-Fugitive Dust-shortpaved
- LG-Commuting-Fugitive Dust-longunpav
- LG-Commuting-Fugitive Dust-longpaved
- LG-Commuting-exhaust-short
- LG-Commuting-exhaust-long
- Summary-short
- Summary-long.

### Off-Highway Vehicles

- ATVs
- OH Motorcycles
- Snowmobiles
- OHV-Summary.

### Resource Roads

- res road-dust and exhaust-short
- res road-dust and exhaust-long.

### Common Variety Minerals

- sg-dry, hand, screen, load, etc.
- sg-unpaved roads
- sg-batchdrop
- heavy equipment-all operations
- gran-crush, screen, tx, etc.
- gran-unpaved roads
- granite-batchdrop
- lime-crush, screen, tx, etc.
- lime-unpaved roads
- limestone-batchdrop
- saleable-summary.

### Vegetation

- Veg-heavyequip-dust-short and long
- Veg-heavyequip-exhaust-short and long
- Veg-Commuting-Fugitive Dust-short
- Veg-Commuting-Fugitive Dust-long
- Veg-Commuting-exhaust-short
- Veg-Commuting-exhaust-long
- Summary-short
- Summary-long.

The tables are linked spreadsheets with emissions calculations for short-term and long-term time frames. Each set of calculations for the non-oil and non-gas spreadsheets is cumulative; that is, the total emissions for all activities are cumulative for 5 and 20 years, respectively. The beginning of each spreadsheet identifies the emission factors and activity factors, in tabular format.

The detailed emissions tables identified above are on an emissions CD and are available by request from Susan Caplan.

### Prescribed Fire Emissions Estimation

To estimate the total emissions of particulate matter and carbon monoxide from prescribed fires, the Simple Approach Smoke Estimation Model (SASEM) was used. SASEM is a simple screening-level Gaussian dispersion model designed to predict ground-level particulate matter impacts from a single source (fire) in generally flat terrain for the western United States.

When available, site-specific information provided by the RFO was used as input to the model. When such information was not available, either built-in model defaults or professional judgment was used to supply missing data.

A total of three scenarios were run according to the information provided by the RFO. These scenarios are as follows:

- **Fire RFA.** Wildland/urban interface; five 20-acre treatments; total of 300 tons burned
- **Timber Harvest Residue.** Ten 10-acre burns, total of 160 tons burned
- **Vegetation RFA.** 4,000 acres per year of prescribed fire treatments.

It should be noted that the emission production module of SASEM was used only to estimate total emissions for each event as input to the qualitative air quality assessment (Sestak and Riebau 1988). The detailed results for these model runs are available from Susan Caplan (contact information provided above).

### Rawlins RMPPA BLM Emissions

Table A4-5 through Table A4-7 show summaries of total BLM emissions, estimated for the base year (2003), the short term (2008), and the long term (2023). The tables are broken down by activity and show emissions for the time frame referenced (i.e., base year, short-term, and long-term). Emissions are calculated on an annual basis (tons per year). In addition, emissions were calculated for both the short-term and the long-term time frames (Table A4-6 and Table A4-7, respectively). (These tables were used to generate the summary tables and figures presented in Chapter 4 of the Proposed RMP/Final EIS).

**Table A4-5. Base Year (2003) Emissions Inventory for  
BLM-Administered Lands Within RMPPA (tons per year)  
Base Case**

Activity	PM <sub>10</sub> Tons	PM <sub>2.5</sub> Tons	NO <sub>x</sub> Tons	SO <sub>2</sub> Tons	CO Tons	VOC Tons	HAPs Tons <sup>b</sup>
Coalbed Natural Gas	137	27	125	5	99	52	8
Coal Mining	32	32 <sup>a</sup>	41	5	72	4	0
Lands and Realty	44	7	2	0	1	0	0
Livestock Grazing	52	8	3	0	3	1	0
OHV	4	4	2	0	256	135	14
Resource Roads	2	0	1	0	0	0	0
Common Variety Minerals	762	200	0	0	0	0	0
Vegetation	9	1	0	0	0	0	0
Fire	170	142	0	0	0	0	0
Subtotal: Other Activities	1,120	401	47	5	330	139	14
Conventional Natural Gas	594	195	3,060	51	1,632	13,564	1,407
<b>Total Base Year 2003</b>	<b>1,851</b>	<b>623</b>	<b>3,232</b>	<b>61</b>	<b>2,061</b>	<b>13,755</b>	<b>1,429</b>

<sup>a</sup> PM<sub>2.5</sub> assumed = PM<sub>10</sub> for this activity. Coal mining will cease after 2004.

<sup>b</sup> HAP assumed = VOC × 0.1 for non-gas activities.

**Table A4-6. Short-Term (2008) Emissions Inventory for BLM-administered Lands Within RMPPA (tons per year)**

Activity	PM <sub>10</sub> Tons	PM <sub>2.5</sub> Tons	NO <sub>x</sub> Tons	SO <sub>2</sub> Tons	CO Tons	VOC Tons	HAPs <sup>b</sup> Tons
Coalbed Natural Gas	530	136	1,298	24	1,391	783	118
Coal Mining	0	0 <sup>a</sup>	0	0	0	0	0
Lands and Realty	44	7	2	0	1	0	0
Livestock Grazing	52	8	3	0	3	1	0
OHV	7	7	3	0	574	209	21
Resource Roads	2	0	1	0	0	0	0
Common Variety Minerals	762	200	NA	NA	NA	NA	NA
Vegetation	64	10	2	0	3	1	0
Fire	170	142	0	0	0	0	0
Subtotal: Other Activities	1,100	374	10	1	581	211	0
Conventional Natural Gas	632	222	3,747	55	2,038	17,357	1,802
<b>Total Short Term</b>	<b>2,262</b>	<b>732</b>	<b>5,055</b>	<b>80</b>	<b>4,010</b>	<b>18,351</b>	<b>1,941</b>

<sup>a</sup> PM<sub>2.5</sub> assumed = PM<sub>10</sub> for this activity. Coal mining will cease after 2004.

<sup>b</sup> HAP assumed = VOC × 0.1 for non-gas activities.

**Table A4-7. Long-Term (2023) Emissions Inventory for BLM-administered Lands Within RMPPA (tons per year)**

Activity	PM <sub>10</sub> Tons	PM <sub>2.5</sub> Tons	NO <sub>x</sub> Tons	SO <sub>2</sub> Tons	CO Tons	VOC Tons	HAPs <sup>b</sup> Tons
Coalbed Natural Gas	867	320	4,602	46	5,374	3,054	466
Coal Mining	0	0 <sup>a</sup>	0	0	0	0	0
Lands and Realty	61	9	4	0	2	1	0
Livestock Grazing	47	7	3	0	3	1	0
OHV	11	11	5	0	889	326	33
Resource Roads	2	0	1	0	0	0	0
Common Variety Minerals	762	200	NA	NA	NA	NA	NA
Vegetation	64	10	2	0	3	1	0
Fire	170	142	0	0	0	0	0
Subtotal: Other Activities	1,117	378	14	1	898	329	33
Conventional Natural Gas	801	293	5,116	67	3,062	16,957	1,797
<b>Total Long Term</b>	<b>2,785</b>	<b>991</b>	<b>9,732</b>	<b>114</b>	<b>9,334</b>	<b>20,340</b>	<b>2,296</b>

<sup>a</sup> PM<sub>2.5</sub> assumed = PM<sub>10</sub> for this activity. Coal mining will cease after 2004.

<sup>b</sup> HAP assumed = VOC × 0.1 for non-gas activities.

## RESULTS OF IMPACT ANALYSIS

Table A4-8 summarizes the existing conditions (described in Chapter 3 of the Proposed RMP/Final EIS, Affected Environment, Air Quality).

**Table A4-8. Existing Conditions**

Air Quality Value	
<b>Air Pollutant Concentrations</b>	
Criteria Air Pollutants	<b>Concentrations</b> Base year: In compliance with NAAQS and WAAQS
<b>Visibility (Rocky Mountain National Park [RMNP] and Centennial)</b>	
Visual Range	<b>20% cleanest:</b> Base year 150–173 miles (RMNP) and 178 (Centennial 2001) <b>Average:</b> Base year 112–126 miles (RMNP) and 117 (Centennial 2001) <b>20% haziest:</b> Base year 71–88 miles (RMNP) and 81 (Centennial 2001) <b>Visibility Guidelines</b> Base year: Within guidelines
<b>Atmospheric Deposition (Centennial, Wyoming)</b>	
Precipitation pH	Base year: 4.9–5.2
Total Deposition	<b>Total nitrogen deposition<sup>a</sup></b> Base year: 4.3 kg/ha/year <b>Total sulfur deposition<sup>b</sup></b> Base year: 2.5 kg/ha/year <b>Total nitrogen deposition guidelines</b> Base year: Not within guidelines 1999: otherwise, within <b>Total sulfur deposition guidelines</b> Base year: Within guidelines

<sup>a</sup> Proposed acceptable total annual loading nitrogen deposition is 3–5 kg/ha/year (USFS 1989).

<sup>b</sup> Proposed acceptable total annual loading sulfur deposition is 5 kg/ha/year (USFS 1989).

The emission inventory results and qualitative impacts are described in detail in Section 4.2, Air Quality Assessment of the Proposed RMP/Final EIS, and total emissions for the Proposed RMP are shown in Table A4-9. Table A4-10 shows the increases in emissions from year to year.

**Table A4-9. Total Emissions (tons per year)**

	2003	2008	2023
Emissions (tons per year)	20,960	29,758	42,305

Note: Totals are all pollutants minus PM<sub>2.5</sub> and HAPs.

**Table A4-10. Increase in Annual Air Emissions from Base Year Conditions on BLM-Administered Lands Within the RMPPA<sup>a</sup>**

Time Frame	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	CO	VOC	HAP
2008	411 (22%)	109 (17%)	1,823 (56%)	19 (31%)	1,949 (95%)	4,596 (33%)	512 (36%)
2023	934 (50%)	368 (59%)	6,500 (201%)	53 (87%)	7,273 (353%)	6,585 (48%)	867 (61%)

<sup>a</sup> Constituents increase in tons per year and (in percentage change from base year emissions)

## OTHER EMISSIONS DATA

Although only BLM activities were included in the qualitative analysis, other emissions data are being developed for areas that include the Rawlins District. These data were provided by TRC Environmental Corp (TRC 2004), using State of Wyoming air permit information and other information, including all potential (PTE) and some actual emissions for point sources throughout Wyoming that were permitted between January 1, 2001, and June 30, 2003. Table A4-11 and Table A4-12 show the calculations of the incremental increase (i.e., change from the base year) in emissions from January 1, 2001 (the base year), through June 30, 2003, for permitted sources.

The Wyoming statewide emission inventory conducted by TRC indicates that there will be a change in future emissions of NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> in the RMPPA and for the State of Wyoming. This study uses different base year dates. The Wyoming statewide complete emissions increases (or decreases) were calculated from (1) all permitted sources from January 1, 2001, through June 30, 2003; (2) all new oil and gas commission sources from 2002; and (3) all NEPA authorized and other quantifiable emissions from June 30, 2003. (This last case is referred to as the Wyoming statewide Reasonably Foreseeable Development [RFD]). It should be noted that not all emissions permitted or authorized during this period are occurring yet.

The RFD case refers only to oil and gas projects and covers the change in emissions after June 30, 2003, for authorized NEPA and other quantifiable emissions. (Specifically, the RFD case is defined by TRC as "...1) the NEPA-authorized but not yet developed portions of the Wyoming NEPA projects and 2) not yet authorized NEPA projects for which air quality analyses were in progress and for which emissions had been quantified.") Also, complete (total) emissions are calculated. Table A4-12 shows these emissions. It is expected that these data will someday be integrated with BLM emissions data to depict all emissions in the Rawlins District and can be used for cumulative analysis. Also, this information will be needed if air dispersion modeling is performed in the area.

**Table A4-11. Incremental Emissions From Permitted Sources, January 2001–June 2003, for the RMPPA**

Area	WDEQ-AQD Permitted Sources Change In Emissions (tpy)				WOGCC Permitted Oil and Gas Wells <sup>a</sup> Change In Emissions (tpy)			
	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Rawlins FO <sup>b</sup>	281	(1,002)	(49)	(49)	9.5	--	--	--
Wyoming	20,344	(85)	(1,812)	(1,539)	150.9	--	--	--

<sup>a</sup> Emission factors per well were assumed according to the following: 0.045 tons per year (tpy) of NO<sub>x</sub> per producing natural gas or coalbed natural gas well, equivalent to well emission rates calculated for the Jonah Infill Project, 2004, and 0.3 tpy NO<sub>x</sub> per producing oil well (obtained from Denise Kohtala, WDEQ-AQD).

<sup>b</sup> Permitted oil and gas wells classification includes Carbon, Albany, and Laramie Counties.

**Table A4-12. RFD and Complete Emissions for the RMPPA<sup>a</sup>**

Area	RFD <sup>b</sup> Change In Emissions (tpy)				Complete Inventory Change In Emissions (tpy)			
	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Rawlins FO <sup>c</sup>	1,147	0	6.8	6.8	1,438	(1,002)	(43)	(43)
Wyoming	6,016	115	741	195	26,510	30	(1,072)	(1,343)

<sup>a</sup> Emission factors per well were assumed according to the following: 0.045 tpy of NO<sub>x</sub> per producing natural gas or coalbed natural gas well, equivalent to well emission rates calculated for the Jonah Infill Project, 2004, and 0.3 tpy NO<sub>x</sub> per producing oil well, obtained from Denise Kohtala, WDEQ-AQD.

<sup>b</sup> RFD defined as authorized NEPA projects and NEPA projects not yet authorized but for which air emissions have been quantified.

<sup>c</sup> Permitted oil and gas wells classification includes Carbon, Albany, and Laramie Counties.

The data in Table A4-11 indicate that permitted sources from January 1, 2001, through June 30, 2003, have contributed additional NO<sub>x</sub> emissions of 281 tons per year and that emissions of other pollutants were reduced for the RMPPA. However, because the base year for the emissions calculations for the Rawlins RMPPA is for 2003, the RFD values in Table A4-12 are more appropriate for comparison of cumulative impact. In Table A4-12, the RFD NO<sub>x</sub> emissions for the RFO are about one-half the NO<sub>x</sub> calculated for the RMP (Table A4-10) for the short term and about one-sixth of the emission differences projected for the long term (see tables above for comparisons). The RFD values for the State of Wyoming are a little less than long-term BLM RMP emissions, except for particulates. (This is to be expected because much of the BLM RMP particulate emissions sources, such as construction activities, do not require a permit.)

## CONCLUSIONS AND RECOMMENDATIONS

A qualitative emission comparison approach was selected for analysis of impacts on air quality. This approach was used because (1) sufficient specific data were not available on future projects, (2) there was limited time available to complete the analysis, (3) quantitative analysis will be required as development projects are defined in the future, and (4) WDEQ-AQD will require demonstration of compliance with federal and state air quality regulations and standards for any future development projects. Given the uncertainties regarding the number, nature, and specific location of future emission sources and activities, the emission comparison approach is defensible and provides a sound basis for analysis. Federal land managers will require a demonstration that potential impacts from proposed projects will not adversely impact AQRV (including visibility) in sensitive Class I and Class II areas.

For the RMP-specific air quality analysis, BLM concludes the following:

- Emissions have been calculated for the base year and for 5-year and 20-year time horizons. Information in Tables A4-7 through A4-9 indicates that the total emissions of criteria pollutants increase from 20,960 tons per year in the base year (2003) to 42,305 per year by 2023. Most of the increase is due to oil and gas exploration and development.
- Given the low ambient concentrations that exist in the Rawlins area for all of the pollutants except ozone, it is expected that the increase in emissions of carbon monoxide (CO), nitrogen oxides (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> will not cause any exceedance of state or federal ambient air quality standards. Because a quantitative relationship between the expected air emissions calculated above and the subsequent potential impacts on ambient criteria pollutant concentrations, visibility, atmospheric deposition, or ozone are not known, it is not possible to draw any conclusions as to potential expected impacts on these air quality values. BLM intends to make quantitative estimates of these impacts for project-specific EISs and in the statewide air quality analysis.

For the cumulative analysis, BLM concludes the following:

- Given the low ambient concentrations that exist in the Rawlins RMPPA for criteria pollutants except ozone, it is expected that the cumulative increase in emissions for all of sources in the region of influence (ROI) of carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> would not cause any exceedance of state or federal ambient air quality standards.
- Because a quantitative relationship between the expected air emissions calculated above and the subsequent potential cumulative impacts on the air quality values of visibility, atmospheric deposition, or ozone are not known, it is not possible to quantify potential impacts on these air quality values from the sources in the ROI. However, because air quality analyses from recent energy development projects, such as the Desolation Flats project (USDI, BLM 2003), estimate potential impacts on visibility, the possibility that the emissions (described in Section 4.2 of the Proposed RMP/Final EIS) may contribute to significant impacts on visibility must be considered. Results of a quantitative analysis using modeling performed for the Desolation Flats EIS suggest that RMPPA activities could contribute to a significant impact on visibility in the Bridger, Fitzpatrick, Mount Zirkel, and Rawah WAs.
- In addition to these findings, monitoring of total nitrogen deposition in the Snowy Range shows deposition loading above the USFS LOC. BLM intends to make quantitative estimates of these impacts for project-specific EISs and in the statewide air quality analysis.

Given the qualitative nature of the emission comparison approach, it is recommended that the following actions be performed:

- A more sophisticated air quality set of tools should be considered for future analysis of specific projects (i.e., modeling).
- Additional monitoring for ambient criteria pollutants, visibility, and atmospheric deposition should be conducted in the area.
- Mitigation measures, such as those discussed in this AQTSD, should be considered. Some of these measures include dust suppression and control during construction, electric power generation for natural gas compressor engines, flareless completion, and natural gas compressor engine nitrogen oxide controls.

## **INTERNET RESOURCES**

Numerous Internet resources were accessed to develop the data used in this document. Key information concerning emission factors and emissions was obtained from EPA websites.

### **Climate**

Western Regional Climate Center: <http://www.wrcc.sage.dri.edu/climsum.html>

NOAA: <http://www.noaa.gov>

Stagnation Index: <http://www.ncdc.noaa.gov/oa/climate/research/stagnation/stagnation.html>

### **Air Quality: Emissions**

EPA: <http://www.epa.gov/ttn/chief/ap42>

### **Air Quality: Concentrations**

EPA: <http://www.epa.gov/air/data/geosel.html>

CASTNet: EPA: <http://www.epa.gov/castnet>

NPS: [http://www2.nature.nps.gov/ard/gas/airatlas-du/viewer\\_index.htm](http://www2.nature.nps.gov/ard/gas/airatlas-du/viewer_index.htm)

BLM: <http://www.blm.gov>

BLM: <http://www.wy.blm.gov>

### **Air Quality: Atmospheric Deposition**

NADP: <http://nadp.sws.uiuc.edu/>

CASTNet: EPA: <http://www.epa.gov/castnet>

NPS: [http://www2.nature.nps.gov/ard/gas/airatlas-du/viewer\\_index.htm](http://www2.nature.nps.gov/ard/gas/airatlas-du/viewer_index.htm)

### **Air Quality: Visibility**

IMPROVE: <http://vista.cira.colostate.edu/improve>

IMPROVE: <http://vista.cira.colostate.edu/views>

FLAG: <http://www.WDEQ-AQD.nps.gov/ard/flagfree>

Wyoming Visibility Monitoring Network: <http://www.wyvisnet.com>

## MITIGATION OPTIONS

Mitigation may be applied to fugitive dust and NO<sub>x</sub> impacts. Fugitive dust refers to any particulate matter that is not deliberately emitted by a well-defined source. Fugitive dust sources typically include windblown dust from unvegetated lands, construction, and unpaved roads. Table A4-13 shows several available fugitive dust mitigation options.

**Table A4-13. Fugitive Dust Mitigation Measures (PM<sub>10</sub>), Effectiveness and Cost**

	Dust Sources					
	Disturbed Areas	Unpaved Roads <sup>a,b,c</sup>				
Effectiveness	Level proportional to percentage of land cover	0–50% reduction in uncontrolled dust emissions	33%–100% control efficiency	80% for 15 mph <sup>c</sup> 65% for 20 mph <sup>c</sup> 25% for 30 mph <sup>c</sup>	30% reduction	90% reduction
Estimated Cost	Unknown	\$4,000/mile	\$2,000–\$4,000/mile per year	Unknown	\$9,000/mile	\$11,000–\$60,000/mile

<sup>a</sup> Improved and county roads

<sup>b</sup> Wetting of construction roads during the construction period. Wetting of construction roads not required for once-a-month maintenance trips to well pads.

<sup>c</sup> Reductions assume a 40-mile-per-hour base speed.

Nitrogen oxide emissions are associated with combustion. Table A4-14 shows several potential mitigation measures that could reduce impacts from NO<sub>x</sub> emissions. The appropriate level of control will be determined by the WDEQ-AQD during the construction permit process.

**Table A4-14. Nitrogen Oxides (NO<sub>x</sub>) Mitigation Measures Efficiency**

	NO <sub>x</sub> Emissions Sources			
	Field Compressors	Sales Compressors	Temporary Diesel Generators <sup>a</sup>	Heavy Equipment
Mitigation Options/Efficiency	Implement Best Available Control Technology Typically results in a NO <sub>x</sub> emission rate of about 1 g/bhp-hr	Implement Best Available Control Technology Typically results in a NO <sub>x</sub> emission rate of about 1 g/bhp-hr	Register with state; WDEQ regulate as appropriate	Voluntary use of electric engines <sup>b</sup>

<sup>a</sup> Wyoming is currently registering these generators to determine whether NO<sub>x</sub> emissions are significant.

<sup>b</sup> BACT could include electric compression.

In addition, Table A4-15 shows additional mitigation measures to be considered. These are general mitigation opportunities that should be considered and applied as appropriate. BLM has no authority to require any application of these measures, although industry is encouraged to implement these measures on its own before it is required to by WDEQ. Advances in technology are likely to offer new mitigation options during the time covered by the RMP. Under NEPA, the planners of individual projects in the RMPPA must recommend mitigation measures that are appropriate for the projects. The Wyoming DEQ,

as the permitting authority, will review permit applications and require specific emission control devices and measures. All costs shown in Table A4-15 are approximate.

**Table A4-15. Additional Mitigation Measures With Approximate Costs and Benefits**

Type of Mitigation	Approximate Cost	Environmental Cost	Potential Limitations	Environmental Benefit
Selective Catalytic Reduction for Compressor Emissions	\$4,000–\$27,000 per NO <sub>x</sub> ton-year	Possible NH <sub>3</sub> releases	Cost may be prohibitive for oil and gas applications	NO <sub>x</sub> emission rate reduced to 0.1 g/hp-hr; decreased visibility impact
“Green Completions” and Flowback Units	Capital cost ranges from \$1,000–\$10,000. Operating cost is \$1,000/year. Payback 1–3 years	Moving equipment to and from well completions; fugitive dust from truck		Saves 100,000 cubic feet of gas per well per year; reduces flaring emissions by 70% to 90% at completion
Condenser on Glycol Dehydrator	\$1,000–\$10,000	Unknown		1%–10% VOC reduction
Activated Carbon Filter on Condensate Storage Tank	\$1,000 and up	Energy required to recycle filter		50%–80% VOC reduction
Electrical Compressors	Capital cost is 40% of gas turbine cost. Operating costs depend on location of transmission lines	Displaced air emissions from compressor unit to electric power plant		Moving air emissions away from sensitive Class I areas
Fugitive Dust Road Treatment	\$2,400–\$50,000 per mile	Possible vegetation effects		20–100% dust control
Fugitive Dust Administrative Control	\$13,000 per well for remote telemetry. A few added work hours per year traveling at enforced speed limits	Minor/unknown	Hard to enforce	Reduced VMTs with related emission reductions. Slower speeds give 20% to 50% reductions in dust emissions
Larger Diameter Sales Pipeline	Capital costs increase with larger pipes. Operating costs decrease with larger pipes	Larger trench for burying line. Slightly more surface disturbance	Probably applicable only for large producing operations	Lower gas pressures with resulting lower compressor emissions
Microhole drilling	Cost of technology transfer, then potentially less than conventional drilling	Additional impacts if duplicate drilling is necessary		Lighter equipment on roads, smaller drilling sites, reduced gaseous emissions during drilling
Condensate Pipelines	Cost of pipe and installation minus cost of eliminated storage tank and trucking	Trench for burying line	Cost may outweigh benefit	Reduce emissions from storage vessels; reduce miles traveled by vacuum trucks

Type of Mitigation	Approximate Cost	Environmental Cost	Potential Limitations	Environmental Benefit
Stage I Vapor Controls for Condensate Transfer for Truck Loading	\$1,000–\$3,000	Potential fire risk with improper operation		90% VOC emission reduction during transfer
Wind Farm Electric Generation	4–5 cents/kW-hr. Capital costs are large	Visual impacts, impacts on raptors, maintenance	Large capital costs required	Reduced power plant emissions. (VOC, NO <sub>x</sub> , SO <sub>2</sub> , CO, CO <sub>2</sub> )
Phased Oil and Gas Development	Short-term loss of state and federal royalties	Emissions averaged over a longer period		Peak emissions and impacts are reduced

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