From: <u>Holladay, Cleve</u>
To: <u>Walker, Elizabeth (AIR)</u>

Subject: FW: FW: FWS Comments on Shady Hills Class I VISCREEN Analyses

Date: Wednesday, March 09, 2011 1:23:31 PM

From: Catherine_Collins@fws.gov [mailto:Catherine_Collins@fws.gov]

Sent: Tuesday, March 08, 2011 5:48 PM

To: Holladay, Cleve

Cc: Tim Allen

Subject: Re: FW: FWS Comments on Shady Hills Class I VISCREEN Analyses

Cleve -- After speaking with Tim Allen our modeler, Shady Hills needs to perform the analysis for each sector individually and not combined. Additionally, for determining the cumulative frequency, this is calculated over the entire day not on individual 6 hour period basis. The cf would be determined to be the highest number for the four time periods of the 24 hour period. There would be one number for cf and not 4 numbers as is currently on the spreadsheet. Then continue to follow the VISCREEN Level 2 Guideance.

Please let me know if you need anything else.

Catherine Collins, Environmental Engineer U.S. Fish and Wildlife Service Air Quality Branch 7333 W. Jefferson Ave., Suite 375 Lakewood, CO 80235-2034 303-914-3807 (303) 969-5444 fax Catherine Collins@fws.gov

"Holladay, Cleve" <Holladay_C@dep.state.fl.us>

To "catherine_collins@fws.gov" <catherine_collins@fws.gov>

CC

02/17/2011 12:17 PM

Subject FW: FWS Comments on Shady Hills Class I VISCREEN Analyses

Catherine,

Here is the Shady Hills response to FLM comments regarding the proposed Shady Hills modification for you to review.

Thanks

Cleve

From: Marks, Steve [mailto:Steve_Marks@golder.com]

Sent: Tuesday, February 08, 2011 2:30 PM

To: Holladay, Cleve

Cc: Larocca, David; Osbourn, Scott; Belden, Roy S (GE Capital)

Subject: FW: FWS Comments on Shady Hills Class I VISCREEN Analyses

Cleve,

Per your email dated August 16, 2010 (included below), please find the responses (in blue) to the FLM comments regarding the Shady Hills modification.

1st -- The Table 7-4 has the frequency of occurrence (percent) broken down into two time periods. This should be broken down into four time periods during the day (e.g., midnight to 6 am, 6 am to noon, noon to 6 pm, and 6 pm to midnight.) I think the last time we commented, we had a similar comment.

Response: A revised Table 7-4 is attached. The table has been revised to include all four 6-hour time periods, though the starting hour of each period has been kept consistent with the original analysis.

2nd -- For the VISCREEN runs beyond the level 1, the wind speed of 4.4 m/s was utilized. Where did this number come from? Please provide an explanation. In addition in the Delta E and Contrast the "Crit" numbers changed from 2.00 to 2.02 and 0.5 to 0.6. There shouldn't be any variation in these numbers. Again, is there an explanation?

A 4.4 m/s wind speed and D stability class were taken from the original (i.e., 2008) study. From the revised Table 7-4, the Level 2 meteorological condition for daytime hours changes to D stability and 4 m/s. For the added nighttime hours, the Level 2 meteorological condition is stable "F" stability and a wind speed of 3 m/s.

Figures CL1-1 and CL1-2 show the Level 1 results for natural gas and fuel oil firing, respectively. Figures CL1-3 and CL1-4 show the Level 2 results for daytime hours for natural gas and fuel oil firing, respectively.

Figures CL1-5 and CL1-6 show the Level 2 results for nighttime hours for natural gas and fuel oil firing, respectively.

The level 2 results presented in CL1-3 and CL1-4 are similar to those presented in the original PSD submittal and demonstrate that the visibility impairment due to the proposed project during hours when the plume would be visible will remain below all visibility criteria.

If you have any questions or comments, please contact me. Thank you.

Steve

Steven R. Marks, M.S, C.C.M. | Associate, Senior Scientist | Golder Associates Inc. 6026 NW 1st Place, Gainesville, Florida, USA 32607
T: +1 (352) 336-5600 Ext. 21139 | F: +1 (352) 336-6603 | E: smarks@golder.com | www.golder.com | www.golder.

Work Safe, Home Safe

This email transmission is confidential and may contain proprietary information for the exclusive use of the intended recipient. Any use, distribution or copying of this transmission, other than by the intended recipient, is strictly prohibited. If you are not the intended recipient, please notify the sender and delete all copies. Electronic media is susceptible to unauthorized modification, deterioration, and incompatibility. Accordingly, the electronic media version of any work product may not be relied upon.

Please consider the environment before printing this email.

From: Holladay, Cleve [mailto:Holladay_C@dep.state.fl.us]

Sent: Monday, August 16, 2010 4:11 PM

To: Marks, Steve **Cc:** Bull, Robert

Subject: FWS Comments on Shady Hills VISCREEN analysis

Steve,

Here are the Fish and Wildlife (Tim Allen and Catherine Collins) comments on the Shady Hills VISCREEN analysis

1st -- The Table 7-4 has the frequency of occurrence (percent) broken down into two time periods. This should be broken down into four time periods during the day (e.g., midnight to 6 am, 6 am to noon, noon to 6 pm, and 6 pm to midnight.) I think the last time we commented, we had a similar comment.

2nd -- For the VISCREEN runs beyond the level 1, the wind speed of 4.4 m/s was utilized. Where did this number come from? Please provide an explanation. In addition in the Delta E and Contrast the "Crit" numbers changed from 2.00 to 2.02 and 0.5 to 0.6. There shouldn't be any variation in these numbers. Again, is there an explanation?

Cleve

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.