



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 8, 2008

John Bunyak  
Air Resources Division  
National Park Service  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Bunyak:

The Department of Ecology has reviewed the 06/27/08 Draft of *Federal Land Managers' Air Quality Related Values Workgroup (FLAG), Phase I Report —Revised*. We find that the draft revised FLAG report meets its goal of providing improved guidance to states on how to assess the impacts of sources on Air Quality Related Values (ARQVs). We offer suggestions, generally of an editorial nature, below for improving the document. In addition, we have found that numerous links to internet pages are broken. We note specific examples below and recommend that links generally be checked before distribution of the final FLAG revision.

1. (p. 8, 4th paragraph) Because of the recent court decision on CAIR, the Federal Land Managers (FLMs) need to stay abreast of developments and revise the text appropriately.
2. (p. 14, final paragraph) Cumulative impact analysis is not a normal part of the permitting procedure and cannot be done unless administrative decisions are made on the baseline date and workable, acceptable procedures. FLMs need to work with states to resolve these issues.
3. (p. 15, following "1. Pre-application...") Shouldn't "2." be "Protocol Review" and "2." through "7" renumbered as "3" through "8." Our experience has shown that FLM involvement in the Protocol Review is extremely important to ensure the success of the subsequent analysis.
4. (p. 29, reference to Tables V.1-1 through V.1-6) The print version of these tables uses 30 pages. Is it necessary to have these tables in the document? In any case, the tables should be accessible on-line in a standard format that may be downloaded and used locally (or queried on-line).
5. (p. 32, "Level-3 Near Field Refined Analysis") This discussion has the potential



to introduce some confusion in interpretation. The reference to the italicized text explicitly states "In EPA's VISCREEN manual, it says" although the rest of the section describes the use of PLUVUE II for the analysis. We suggest the first paragraph of this section begin with a reference to PLUVUE II and its use in the analysis and then state the objective (the italicized text) with only a reference to the VISCREEN manual as its source.

6. (p. 34, first complete paragraph) We suggest revising the text to clarify that all receptors within each Class I Area are grouped for the 98th percentile test.

7. (p. 36) The NPS Air Resources Division Website [Website should be capitalized] [http://www.nature.nps.gov/air/permits/emissions\\_ControlTech.cfm](http://www.nature.nps.gov/air/permits/emissions_ControlTech.cfm) generates a "Page Not Found" error but the returned URL is printed in all lower case, implying an error on the server:

The page you are trying to find,  
[http://www.nature.nps.gov/air/permits/emissions\\_controltech.cfm](http://www.nature.nps.gov/air/permits/emissions_controltech.cfm), may be unknown, expired, or temporarily unavailable.

8. (p. 40-42, Example Calculation for Alpine Lakes Wilderness)
- (1) Use only the line for Alpine Lakes in the excerpt from Table V.1-6.
  - (2) Make sure that the table is on the same page as the rest of the example.
  - (3) Provide the details for step 3 "Calculate the large and small sulfate, nitrate, and organic mass."
  - (4) Keep the table header with the table that is split across p. 41 and p. 42.
9. (p. 43) The Revised IMPROVE equation should not be simply an explanatory figure. Place it before the example calculation beginning on p. 40.
10. (p. 81) The Ozone Sensitive Species training is quite challenging. Good job!
11. (p. 82) <http://www.ars.usda.gov/Main/docs.htm.docid=8453> produces a broken link.
12. (p. 82) <http://www.ncl.ac.uk/airweb/ozone/ozone.htm> produces a broken link.
13. (p. 94, final paragraph of section e. Other AQRV Identification and Assessment Tools) Remove reference to ISCST and we expect substitute AERMOD.
14. (p. 95) [http://www.nature.nps.gov/air/permits/flag/docs/N\\_SDATGuidance.pdf](http://www.nature.nps.gov/air/permits/flag/docs/N_SDATGuidance.pdf) produces a "page not found". The same is true for [http://www.fs.fed.us/air/technical/class\\_1/index.htm](http://www.fs.fed.us/air/technical/class_1/index.htm)
15. (p. 102) <http://www.epa.gov/scram001/t29.htm> produces a "page not found".

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September 8, 2008  
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We congratulate the FLMs on a useful draft revision of the FLAG report and look forward to the release of the final revised report. Please contact Doug Schneider at 360-407-6874 if you would like to discuss out comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Johnston". The signature is written in a cursive, flowing style.

Jeff Johnston, Section Manager  
Science & Engineering Section  
Air Quality Program

JJ:DS:tw