

AIR RESOURCE OPTIONAL CHECKLIST FOR TECHNICAL WORKGROUP FOR MEMORANDUM OF UNDERSTANDING IMPLEMENTATION

This checklist is an optional guide to assist in directing and documenting the activities of the Technical Workgroup (TWG) during the implementation of the Memorandum of Understanding (MOU) for oil and gas development. This checklist may be used in addition to the Compliance Checklist included in the “BLM Land Use Planning Compliance with NEPA Air Quality MOU for Federal Oil and Gas Decisions” WO-210 Internal Working Document (see step 5 of that document).

The following steps in this checklist should be completed prior to applicable federal oil and gas planning, or field development decisions are made (Section V.D.*). This checklist does not take into account changes in the proposed action or if other alternatives need to be analyzed, etc., and the impacts such changes would have on the proposed timelines. The typical time to complete an activity is included in the checklist and has been categorized by three project types:

- **Simple:** A small project with few wells (1 or 2) and a small amount of emissions. Note that some state offices do not use the MOU process for small Environmental Assessment (EA) level activities, unless they are located in, near, or on the border of a Class I or Class II area.
- **Medium:** A project where there are air quality issues that require air analysis. (How significant are the emissions, how many wells, and what is the geographical distance to a Class 1 area?) The same amount of work will be required whether an EA or EIS.
- **Complex:** A project that most likely involves a Resource Management Plan (RMP) and/or requires an environmental impact statement (EIS).

List of Activities	References*	Typical Time by Project Type			Comments
		Simple	Medium	Complex	
1. As early as possible after an oil or gas development action is proposed on	Section V.C.				

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		Simple	Medium	Complex	
federal land, the Lead Agency initiates the NEPA process and begins the activities required by NEPA for the approval of the proposed action.					
2. The Lead Agency develops & evaluates the NEPA scoping (internal and external) for the proposed action to determine if air quality (AQ) or air quality related values (AQRV) will be significantly impacted, or a concern.	Section V.C.1 - 3.	2 – 3 weeks	8 - 12 weeks	8 - 12 weeks	
3. The Lead Agency, with help from the leaser/developer, develops a work plan which includes size, scope, location of the proposed project, information about the affected environment, number of oil/gas wells expected, the supporting baseline AQ and AQRV analyses, monitoring protocols, project schedule, and also determines if modeling is required.	Section V.E.1.	4 weeks	4 - 8 weeks	8 – 12 weeks	Timeline may depend on if previous analysis can be reused (quicker) or if you have to develop the analysis from the beginning (months longer). Could take 4 weeks to 6 months. Other factors may include what

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					background data exists and what type of analysis is performed (photochemical grid model will take much longer)
4. If modeling is not required, the Lead Agency documents its decision not to model and includes a qualitative narrative analysis of the impacts to air quality and AQRVs in the appropriate NEPA documents.	Section V.E.5.	2 – 4 weeks	2 - 6 weeks	2 - 6 weeks	
5. If modeling is required, the Lead Agency convenes a technical workgroup (TWG) composed of air specialists, modelers, and NEPA planning experts for the cooperating agencies. Existing stakeholder groups that comply with the Federal Advisory Committee may also be consulted. Collaboration with state/local environmental regulatory agencies and tribal groups is also	Section V.C.1.		4 weeks	4 weeks	

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encouraged.					
6. The Lead Agency with support from the lease/developer develops a modeling protocol. Modeling is conducted in accordance with the Appendix in the MOU. The TWG agrees to the modeling protocol.	Section V.E.3.				
7. The TWG reviews the initial analyses and may present comments on the analyses. The Lead Agency responds to the comments. This action may require two or more iterations before resolving the issue.		4 weeks	8 weeks	4 weeks – 8 months	
8. The Lead Agency models the proposed action.	Section V.E.3.				Will depend on the complexity of the model used.
9. The TWG reviews the modeling, presents areas of concern or issues, if any, and works with the Lead Agency to reach resolution.		4 – 8 weeks	4 – 8 weeks	4 – 8 weeks	The comment response period may be 30 days.
10. If the necessary quantitative analyses cannot be completed, the Lead	Section V.D.1.		4 - 8 weeks	4 – 8 weeks	

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<p>Agency develops and includes the following information in the NEPA document.</p> <ul style="list-style-type: none"> a. A qualitative narrative description of the air quality issues or impacts. b. A statement of when more detailed information will likely be available. c. A commitment to complete the air quality and AQRVs analyses once the requisite information is available. 					
<p>11. The Lead Agency discloses in the NEPA document that the proposed action has conformed to General Conformity requirements. Document any Best Management Practices and/or mitigation.</p>	Section V.F.	4 - 6 weeks	4 - 6 weeks	4 - 6 weeks	
<p>12. The Lead Agency calculates, and disclose in the NEPA document, Prevention of Significant Deterioration (PSD) increment</p>	Section V.G.	4 - 8 weeks	4 - 8 weeks	4 - 8 weeks	

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consumption from the proposed action at Class I Areas, Visibility impacts, Applicable National Ambient Air Quality Standards, State Implementation Plan Compliance, Control of Pollution from Federal Facilities, Others, as required.					

*Memorandum of Understanding among the U.S. Department of Agriculture, U.S. Department of The Interior, and U.S. Environmental Protection Agency, Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the National Environmental Policy Act Process, signed June 23, 2011