

Carl Carmichael

please see attached file for my comments Carl

November 4, 2016

Administrator
Air Quality Division
200 West 17th Street
Cheyenne, Wyoming 82002
Dear Administrator:

I am writing to express support for the Wyoming DEQ Air Quality Division's recommendation to incorporate the U.S. Environmental Protection Agency's New Source Performance Standards (NSPS) into the Wyoming Air Quality Standards and Regulations. These rules are critical to reducing methane emissions and reducing other pollutants that impact the health and wellbeing of our citizens.

While I strongly support the adoption of these important new federal standards, The NSPS applies only to new and modified sources. A significant gap remains with respect to existing pollution sources. All of the current methane, volatile organic compounds and air toxics reported by industry to the state and EPA emanate from existing sources. The only current requirements that will reduce such pollution are the Wyoming rules that apply to sources only in the Upper Green River Basin nonattainment area. EPA has yet to propose any requirements that will apply comprehensively to emissions of methane and VOCs from existing sources.

That is why I would like to see the state expand its strong state emissions reductions requirements in the Upper Green River Basin across Wyoming. I am especially concerned about the current flaring and venting of natural gas resources and the loss of this revenue source.

We have a moral responsibility to reduce waste occurring on public lands. In doing so, we protect our citizens from air pollution and prevent non-renewable resources from being lost into the environment. Waste causes unnecessary environmental degradation and adds to the problems associated with climate change. Wasting our resources ensures those resources will never be used as a revenue source for our schools and communities. There is no one solution to Wyoming's budgetary challenges but we can and should start by reducing the needless waste of our natural gas resources. Recently, the Consensus Revenue Estimating Group projected Wyoming's K-12 budget alone will be short \$103 million for the current two-year funding cycle. In this climate, waste cannot be tolerated.

I ask that the Environmental Quality Council adopt the EPA's regulations on Standards of Performance for New Stationary Sources found in 40 CFR part 60, Subpart OOOOa by incorporating them into the Wyoming Air Quality Standards and Regulations. This is a very important step. It is however just one of the necessary steps and the state that should expedite the strengthening of statewide flaring and venting regulations and comprehensive requirements addressing methane and VOCs from existing sources.

Thank you for your attention to this very important issue.

Sincerely,



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