



Derek Silbaugh
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VIA EMAIL AND [HTTP://AQ.WYOMINGDEQ.COMMENTINPUT.COM/](http://AQ.WYOMINGDEQ.COMMENTINPUT.COM/)

Nancy E. Vehr
Administrator
Wyoming Department of Environmental Quality
Air Quality Division
200 West 17th Street Cheyenne, WY 82002
nancy.vehr1@wyo.gov

RE: Comments on Proposed Air Quality Rule Revisions (EQC Docket #23-2101)

Dear Ms. Vehr:

Black Hills Energy (BHE) is submitting comments on Wyoming Department of Environmental Quality, Air Quality Division's (AQD's) proposed changes to Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 5, Section 2, as described in the Wyoming Environmental Quality Council (EQC) rulemaking Docket #23-2101 (R-35). BHE understands the proposed removal of 40 CFR Part 60, subpart TTTT, Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units, from the WAQSR will abdicate enforcement of this New Source Performance Standard to the U.S. Environmental Protection Agency.

BHE currently holds Air Quality Construction Permit P0029888 that includes the requirements to comply with New Source Performance Standards subpart KKKK and subpart TTTT. If the proposed rule revision is approved, BHE will be subject to enforcement by two agencies for the same permit – AQD for subpart KKKK and EPA for subpart TTTT. BHE prefers to work with a single agency.

BHE has a long-standing history of working with AQD and respectively requests AQD and EQC retain subpart TTTT within WAQSR Chapter 5, Section 2. If you have questions, please do not hesitate to contact me or Cole Anderson, Environmental Manager.

Sincerely,

Derek Silbaugh
Director Generation Engineering & Environmental Services