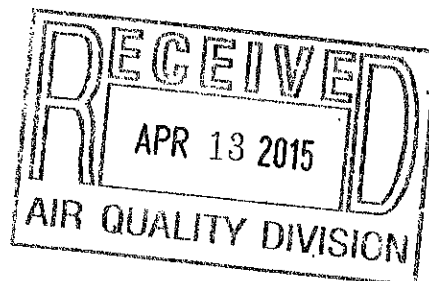


**American Lung Association in Wyoming
Wyoming Public Health Association
Wyoming Comprehensive Cancer Control Consortium
Wyoming Society for Respiratory Care**

April 13, 2015

Mr. Steven A. Dietrich
Administrator, WDEQ/AQD
Herschler Building 2-E
122 W. 25th Street
Cheyenne, Wyoming 82002



Via fax: 307-777-5616 and U.S. Mail

Dear Administrator Dietrich:

The undersigned Wyoming health and medical organizations support the adoption of changes proposed to Wyoming Air Quality Standards and Regulations, Chapter 8, Nonattainment Area Regulations. The proposed rules will go a long way toward better protecting the public from the adverse health effects of various air pollutants emitted by oil and gas facilities in the Upper Green River Basin, and particularly ground-level ozone.

The mission of American Lung Association in Wyoming is to save lives by improving lung health and preventing lung disease. We work to reduce tobacco use and tobacco-related lung disease, improve the air we breathe so it will not cause or worsen lung disease, and reduce the burden of lung disease on patients and their families.

Representing nearly 135 members from 40 organizations in nearly all 23 counties of the state, the Wyoming Public Health Association works to ensure the public's health in Wyoming. We promote and protect the public's health in a variety of ways, including program development and advocacy on behalf of good state and local public health policy and legislation.

The Wyoming Comprehensive Cancer Control Consortium is charged with implementing the Wyoming Cancer Control Plan, which provides a clear vision of how we can address the Cancer Burden in Wyoming. The Wyoming Comprehensive Cancer Control Consortium is made up of over 80 organizations, and 300 members, united through a shared vision, common commitment, and collaborative activities. For more information visit www.fightcancerwy.org.

The Wyoming Society for Respiratory Care is formed to encourage, develop and provide educational programs for those persons interested in respiratory therapy and diagnostics, to advance the science, technology, ethics and art of respiratory care through meetings, lectures, publications, and other materials, facilitate cooperation and understanding among respiratory care personnel and the medical profession, allied health professions, hospitals, service companies, industry, government organizations, and other agencies interested in respiratory care, and to provide education to the public in pulmonary health promotion and disease prevention.

As you know, unhealthy levels of ozone pollution are of great concern in the Upper Green River Basin, so much so that the EPA has designed the area as a "nonattainment" area for repeatedly violating the national health-based standard for ozone. The unhealthy ozone levels in Sublette County have, for the past several years, led to failing grades in the American Lung Association's annual "State of the Air" reports. At times, ozone levels in Sublette County have exceeded those in Los Angeles, California.

Ground-level ozone is a serious health threat and powerful respiratory irritant. When a person inhales ozone pollution, it reacts chemically with the body's internal tissues, causing inflammation of the lung. Ozone pollution above certain concentrations is associated with serious health effects, including aggravated asthma, chronic bronchitis, and heart attacks, and in some cases premature death. Ozone can cause painful breathing, lung inflammation and, over time, may permanently damage the lungs, and is associated with increased hospital admissions and emergency room visits¹. The evidence documenting these effects includes actual laboratory studies on human volunteers, as well as epidemiological and animal data.

In a recent evaluation involving a panel of expert scientists, the Clean Air Scientific Advisory Committee, and the public, and including hundreds of new studies, the EPA identified ground-level ozone as a serious health threat, concluding the following with respect to ozone pollution:

- Causes respiratory harm (e.g. worsened asthma, worsened COPD, inflammation);
- Likely to cause early death (both short-term and long-term exposure);
- Likely to cause cardiovascular harm (e.g. heart attacks, strokes, heart disease, congestive heart failure);
- May cause harm to the central nervous system; and
- May cause reproductive and developmental harm.

¹ Researchers have documented the association between high ozone levels and increased clinic visits for adverse respiratory-related effect in Sublette County. The study found that for every 10 ppb increase in ozone there was a 3 percent increase in local health clinic visits due to respiratory-related complaints the day following elevations of ozone. Pride, K., Peel, J., Robinson, B., Busacker, A., Grandpre, J., Yip, F., Murphy, T. Associations of Short-Term Exposure to Ground-Level Ozone and Respiratory Outpatient Clinic Visits in a Rural Location — Sublette County, Wyoming, 2008–2011. *Environmental Research* 137(2015)1–7.

—U.S. Environmental Protection Agency. *Integrated Science Assessment of Ozone and Related Photochemical Oxidants (Final Report)*. U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-10/076F, 2013.

While anyone who spends time outdoors when ozone levels are high enough may experience symptoms such as shortness of breath, dry cough or pain when taking a deep breath, tightness of the chest, wheezing, or nausea, certain groups of people are particularly vulnerable to the effects of breathing ozone. They include:

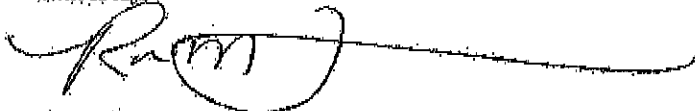
- Children and teens;
- Anyone 65 and older;
- People who work or exercise outdoors;
- People with existing lung diseases, such as asthma and chronic obstructive pulmonary disease (also known as COPD, which includes emphysema and chronic bronchitis); and
- People with cardiovascular disease.

The proposed rules, which require various technical controls, such as regular leak detection inspections at well sites and installation of newer, less polluting pieces of equipment, are necessary to reduce emissions of hydrocarbon compounds and nitrogen oxides (which combine to form ozone pollution) from oil and gas operations. Oil and gas development is the largest emission source for these pollutants in the Upper Green River Basin's Sublette, Lincoln, and Sweetwater counties.

Protecting the air that Wyoming residents breathe by reducing ozone and other pollutants from oil and gas operations is an important public health issue and we are glad to see the Wyoming DEQ attempt to better protect local citizens in its proposed rules. We request that: 1) the Environmental Quality Council adopt the proposed rules at the hearing in Pinedale on May 19, 2015; and 2) the rules be implemented without further delay. Reducing emissions of air pollutants from oil and natural gas operations is crucial to minimizing health impacts to Wyoming citizens.

Lastly, in view of the fact that oil and gas development is increasing in other parts of the state, and particularly in the eastern part of the state, where the sorts of controls embodied in the UGRB proposed rules do not exist, we ask that the Wyoming Department of Environmental Quality consider developing a similar set of requirements on a statewide basis.

Sincerely,



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<http://www.wysrc.org/index.asp>