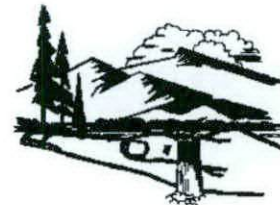




Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

Todd Parfitt, Director

November 16, 2016

Ronni Flanner
Healthy Air Director
American Lung Association in Wyoming
936 2nd Street, West
Missoula, MT 59801

RE: Response to American Lung Association in Wyoming's Comments on Wyoming's Proposed Revisions to Chapter 2, Sections 6 and 12, Ambient Standards, Chapter 3, Sections 3 and 9, General Emission Standards, Chapter 4, Section 6, State Performance Standards for Specific Existing Sources, Chapter 5, Sections 2 and 4, National Emission Standards, Chapter 6, Sections 3 and 14, Permitting Requirements, Chapter 7, Section 3, Monitoring Regulations, Chapter 8, Section 10, Nonattainment Area Regulations, and Chapter 11, Section 2, National Acid Rain Program of the Wyoming Air Quality Standards and Regulations (R-27)

Dear American Lung Association in Wyoming:

Thank you for submitting your comment regarding the Wyoming Department of Environmental Quality (DEQ) – Air Quality Division's (Division) proposed rulemaking package (R-27), which includes proposed revisions that incorporate by reference the Environmental Protection Agency's (EPA) New Source Performance Standards (NSPS), Subpart OOOOa, from the Code of Federal Regulations (CFR) into the Wyoming Air Quality Standards and Regulations (WAQSR). The Division appreciates the time and resources committed by the American Lung Association in reviewing the proposed revisions and providing a written comment. The Division also appreciates the support with the implementation of OOOOa and TTTT. The proposed rules will ensure that the State maintains primacy over these federal rule updates – including OOOOa – that would otherwise still apply to sources at the federal level.

Regarding the American Lung Association's comment regarding addressing fugitive air emissions from oil and gas emissions, those items are beyond the scope of this rulemaking.

As clarification to the American Lung Association's 2016 State of the Air Report's finding that ground-level ozone pollution has increased in several Wyoming counties, evidence shows that all counties have been attaining the national standard for ozone backed with quality assured data. Having levels under the national standard ensures that counties in Wyoming have clean and safe air for the public. EPA has acknowledged that the Upper Green River Basin (UGRB) has attained the 2008 Ozone National Ambient Air Quality Standard (NAAQS)¹. The State of

¹ See 81 Fed. Reg. 26697 (May 4, 2016)

Wyoming has recommended that EPA designate statewide attainment for the 2015 national standards.²

A public hearing before the Environmental Quality Council is scheduled for 1:30 P.M. on November 17, 2016, in Room 1699 of the Herschler Building, 122 West 25th Street, Cheyenne, Wyoming. Please feel free to contact me at 307-777-3746 if you have any questions regarding the proposed rulemaking.

Sincerely,



Nancy Vehr
Air Quality Administrator
Department of Environmental Quality

Cc: Amber Potts, AQD
Darion Donnelly, AQD
Rob Leteff, AQD
Mike Morris, AQD

² See Wyoming Governor's Office Letter, 2015 Ozone National Ambient Air Quality Standard (NAAQS) – Wyoming Designation Recommendation, (2016).