



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

April 8, 2014

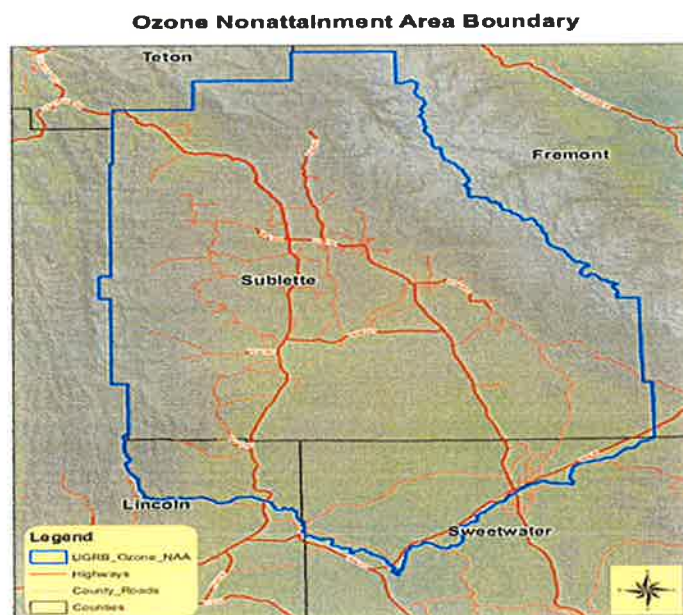
Ozone Advance
c/o Laura Bunte, Mail Code C304-01
109 TW Alexander Dr.
RTP, NC 27711

RE: Wyoming Department of Environmental Quality – Air Quality Division’s Ozone Advance Annual Update

Dear Ms. Bunte:

On April 12, 2012, the Wyoming Department of Environmental Quality – Air Quality Division (AQD or Division) signed up to participate in the Environmental Protection Agency’s (EPA) Ozone Advance Program as a proactive measure intended to encourage and identify early emission reductions in ozone attainment areas in order to help maintain the 2008 National Ambient Air Quality Standards (NAAQS) for ozone. On July 20, 2012, the Upper Green River Basin (UGRB) in southwest Wyoming was designated nonattainment for the 2008 8-hour ozone standard (Figure A).

Figure A



While the State is aware that participation in the program does not relieve the State of its obligations under nonattainment regulations, it is understood that participation in the program can better position the State to comply with the requirements associated with such a designation. The AQD has been working to understand the unique wintertime ozone episodes since 2005, and already instituted a number of control measures in the UGRB. The State appreciates EPA's establishment of an Ozone Advance Program that will provide incentives for areas that achieve early emission reductions.

On April 8, 2013, Wyoming submitted to EPA a "path forward letter" describing measures and/or programs the State would implement in the UGRB ozone nonattainment area. As the Ozone Advance Guidance instructs, a participating area should briefly and informally summarize the status of each of the area's measures and programs implemented under Ozone Advance. An update on those programs is provided below:

Table 1 shows the running year-to-date emissions reductions in the UGRB (as of March 19, 2014) that have been achieved through the implementation of the *Interim Policy on Demonstration of Compliance with Wyoming Air Quality Standards and Regulations (WAQSR), Chapter 6, Section 2(c)(ii) for Sources in Sublette County* (Interim Policy) from the permitting baseline of April 1, 2008. Controlled emission reductions in the UGRB have been achieved through, but are not limited to, the installation of controls on storage tanks, installation of low bleed/no bleed pneumatic controllers, installation of controls on drill rig engines, and the installation of centralized gathering facilities.

Table 1. Running Year-to-Date Emissions Reductions (tpy)

	2008	2008-2009	2008-2010	2008-2011	2008-2012	2008-2013	2008-2014*
VOCs	-196.6	-1322.1	-2302.2	-3555.1	-3926.9	-5129.9	-5209.4
NO _x	-33.6	-606.7	-1695.2	-1545.7	-1457.2	-1537.0	-1528.7

* Through March 19, 2014

The AQD requires operators to obtain an air quality permit to conduct well completion/re-completion activities in the UGRB. "Green" completion requirements have expanded over the years; from the Jonah/Pinedale Anticline Development Area (JPDA) in 2005 to encompassing the entire UGRB in 2010. Table 2 summarizes the emissions from reports provided by operators and compares what emissions could have resulted by not having the "green" completion permit requirement in place.

Table 2. Completion Emissions Summary (VOCs tpy)¹

	2005	2006	2007	2008	2009	2010	2011	2012	2013 ²
Reported (Controlled) Emissions ³	122	203	144	130	67	57	19	8.4	4.0
Uncontrolled Emissions ⁴	1220	2033	1443	1304	665	569	194	84	40
Emissions offset by AQD Permits	-1098	-1830	-1299	-1174	-598	-512	-175	-76	-36

¹ Emissions rounded to the nearest ton.

² Based on all reports received through March 19, 2014.

³ Total reported emissions from all operators in the JPDA.

⁴ Assuming the 90% VOC emissions reductions included in BACT section for the AQD's permits.

The implementation of the Interim Policy and “green” completion permits are ongoing programs that consistently help reduce emissions of NO_x and VOCs in the UGRB.

The 2014 UGRB Winter Ozone Update/Ozone Action Day program ran from January 2 to March 28, 2014. The Winter Ozone Update is a daily weather-based forecast geared towards increasing public health awareness of high ground level ozone potential. Winter Ozone Updates were made available to the public on the Wyoming Department of Environmental Quality (WDEQ) website, through a toll-free phone number, via email and a daily radio broadcast from the KPINE radio station in Pinedale, Wyoming. In previous years, on days when forecasters have issued an Ozone Action Day (OAD), everyone is encouraged to implement an Ozone Contingency Plan (OCP). OCPs are voluntary, short-term emission reduction plans that can be implemented with 24-hour notice of an OAD. As of the conclusion of the 2014 Winter Ozone Update/Ozone Action Day season, no Ozone Action Days were issued and no episodes of elevated ozone exceeding the NAAQS of 75 ppb were monitored. The number of participants developing OCPs increased from 31 in 2013 to 36 in 2014, and the Division will continue to encourage increased participation into future years.

The State of Wyoming incorporated by reference 40 CFR 51.165, Nonattainment Area New Source Review (NAA NSR) requirements into the Wyoming Air Quality Standards and Regulations (WAQSR) on September 7, 2010. A State Implementation Plan (SIP) update consisting of WAQSR Chapter 6, Section 13 was submitted to the EPA on May 10, 2011. As of today's date, the SIP update has not been acted upon by the EPA.

Wyoming's General Conformity SIP was approved by EPA on September 16, 2013. This SIP ensures that the actions taken by federal agencies in the nonattainment area do not interfere with AQD's strategy to bring the UGRB back into attainment of the 2008 8-Hour Ozone NAAQS.

The New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) for oil and gas industries was incorporated by reference into the WAQSR on November 22, 2013, and a delegation request was submitted to EPA on January 10, 2014.

The WDEQ has also been successful implementing Clean Air Act (CAA) Section 182 requirements for "marginal" nonattainment areas. The AQD finalized an ozone nonattainment emission inventory rule into the WAQSR on November 22, 2013.

The WDEQ-AQD considers participation in the Ozone Advance Program to be a benefit; however, the State still has concerns about moving forward without a final ozone implementation plan and without affirmed modeling tools appropriate for rural and wintertime ozone areas. EPA has offered assistance to States participating in Ozone Advance, and these are two areas where assistance would be greatly appreciated. The implementation of Wyoming's Ozone Advance measures and programs are important in continuing to help bring the UGRB back into ozone attainment, and the AQD will continue to investigate additional solutions to further reduce ozone levels in the UGRB.

The State of Wyoming looks forward to continuing to work with the EPA as the Ozone Advance Program continues to evolve.

Sincerely,

A handwritten signature in blue ink that reads "Steven A. Dietrich". The signature is written in a cursive style with a large initial 'S'.

Steven A. Dietrich, P.E.
Air Quality Administrator

cc: Jeni Cederle, AQD
Jody Ostendorf, EPA R8