

# Office of the Governor

May 24, 2011

James B. Martin, Regional Administrator  
EPA Region 8  
Mail Code: AP-AR  
1595 Wynkoop Street  
Denver, CO 80202-1129

**Re: 1-Hour Primary National Ambient Air Quality Standard (NAAQS) for Sulfur Dioxide (SO<sub>2</sub>)**

Dear Mr. Martin:

The State of Wyoming is making recommendations regarding designations of the 1-hour primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>) that became effective on June 22, 2010.

The Department of Environmental Quality (DEQ) reviewed the most recent three years of SO<sub>2</sub> monitoring data available to make designation recommendations. The results and supporting data are found in Attachment 1 to this letter. Based on a review of the monitoring data, the DEQ would recommend "attainment" for all counties in the State. However, the DEQ has also reviewed the March 24, 2011 Steven A. Page memo, "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards," which sets forth a different approach to making designations relying heavily on modeling rather than monitoring. The guidance recommends a temporary unclassifiable status for most areas of the country due to a lack of modeling. Based on this guidance, the State is left with no option but to designate all counties of the State, as indicated in the table below, as "unclassifiable" for the current 1-hour primary standard for sulfur dioxide.

Regions	1-Hour Primary SO <sub>2</sub> NAAQS Designation
Albany County	Unclassifiable
Big Horn County	Unclassifiable
Campbell County	Unclassifiable
Carbon County	Unclassifiable
Converse County	Unclassifiable

MAY 31 2011  
RECEIVED  
U.S. EPA Region 8  
AP's Office

Crook County	Unclassifiable
Fremont County	Unclassifiable
Goshen County	Unclassifiable
Hot Springs County	Unclassifiable
Johnson County	Unclassifiable
Laramie County	Unclassifiable
Lincoln County	Unclassifiable
Natrona County	Unclassifiable
Niobrara County	Unclassifiable
Park County	Unclassifiable
Platte County	Unclassifiable
Sheridan County	Unclassifiable
Sublette County	Unclassifiable
Sweetwater County	Unclassifiable
Teton County	Unclassifiable
Uinta County	Unclassifiable
Washakie County	Unclassifiable
Weston County	Unclassifiable

There are portions of the above mentioned counties which are under the jurisdiction of Tribal Authorities. It is my understanding that Tribal designations will be made separate from State designations.

I am not convinced that the hybrid approach described in the guidance, which gives modeling considerably more weight than monitoring, is the correct method to apply. I question whether the hybrid approach promoted by EPA is based on sound science, since I have not been provided with a solid demonstration showing the accuracy of the model in predicting monitored conditions. I also question why EPA would want to undermine the validity of monitored data, which most states depend on for ground-truthing their air programs. It is my belief that there needs to be more discussion with states on how to designate areas for the new 1-hour SO<sub>2</sub> standard. Wyoming looks forward to participating in such a discussion.

I hope that the EPA will reconsider the hybrid approach in addressing designations. If you have questions concerning the details of this recommendation, please feel free to contact Steven A. Dietrich, Administrator, Department of Environmental Quality, Air Quality Division, at 307-777-7391.

Best regards,

  
Matthew H. Mead  
Governor

Mr. James B. Martin

May 24, 2011

Page 3

Cc: John V. Corra, Director, DEQ  
Steven A. Dietrich, Administrator, Air Quality Division, DEQ  
Christine Anderson, Air Quality Division, DEQ  
Cara Keslar, Air Quality Division, DEQ  
Chad Schlichtemeier, Air Quality Division, DEQ

### ATTACHMENT 1: SO<sub>2</sub> Monitored Data in Wyoming 2007-2009

The 1-hour primary SO<sub>2</sub> NAAQS is met when the three-year average of the 99<sup>th</sup> percentile daily maximum 1-hour concentration, as determined in accordance with 40 CFR part 50 Appendix T, Interpretation of the Primary National Ambient Air Quality Standards for Oxides of Sulfur (Sulfur Dioxide), is the 3-year average of the annual 99<sup>th</sup> percentile daily maximum 1-hour values for a monitoring site. The following table presents data collected from 2007-2009 that have met the data collection requirements presented in Appendix T.

Monitor Name	AQD Site ID	3-Year 99 <sup>th</sup> Percentile Average (ppb)
Black Hills	56-005-0857	63
Murphy Ridge	56-041-0101	4
Newcastle Refinery	56-045-0800	24
South Pass	56-013-0099	4
Wamsutter	56-037-0200	5

**State of Wyoming Map Showing Monitor Locations Considered in this Analysis**

