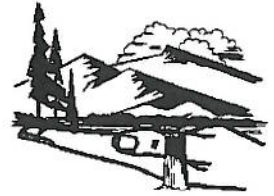




# Department of Environmental Quality

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



Matthew H. Mead, Governor

John Corra, Director

June 30, 2011

Comments submitted via e-mail  
[EEguidancecomments@epa.gov](mailto:EEguidancecomments@epa.gov)

RE: Wyoming's Comments on High Wind Exceptional Event Guidance

To Whom It May Concern:

The Wyoming Department of Environmental Quality – Air Quality Division (WAQD) has reviewed the May 2, 2011 draft of the "Guidance on the Preparation of Demonstration in Support of Requests to Exclude Ambient Air Quality Data Affected by High Winds under the Exceptional Events Rule" (Guidance). Overall, WAQD finds the Guidance to be useful in more clearly defining the analyses that EPA expects in a Demonstration that can be concurred with. WAQD is in support of a wind threshold for events and also appreciates that EPA has defined timeframes in which EPA's review and determinations will be made.

Comments in this document are organized by required elements of the Demonstration.

### **Not Reasonably Controllable or Preventable**

#### High Wind Action Plans:

The WAQD believes that there should be a process included in the Guidance to roll current Natural Events Action Plans (NEAP) into High Wind Action Plans. NEAPs, already in place throughout the West, were formed as an agreement between EPA, State regulatory agencies, industry, and the public. They already define timelines for industry and the State to follow, reasonableness of controls, and enforcement actions.

For instance, there is a Natural Events Action Plan in place for coal mines in the Powder River Basin (PRB) that has been an effective tool for controlling fugitive dust and preventing exceedances. The NEAP was approved by EPA Region 8 in January 2007. The last exceedance due to high winds that occurred in the PRB was in the summer of 2007. Because the NEAP has been successful, the WAQD would like the opportunity to incorporate elements of the new Guidance into the existing NEAP during the 5-year review.

#### Consideration of Recurrence:

The WAQD supports a threshold for determining high wind events and believes 25 miles per hour (mph) is an appropriate choice based on experience in Wyoming. However, the WAQD is concerned that under Guidance Section 3.1.4, EPA has already determined that exceedances which occur or recur when winds are regularly greater than 25 mph will require a more detailed control analysis and enhanced controls. The purpose of the Guidance is to deal with high wind events defined as greater than 25 mph.



To further caveat and categorize high winds greater than 25 mph is unwarranted given the level of documentation already being requested.

#### Comprehensive Control Analysis:

The WAQD has serious concerns regarding elements that are required for the comprehensive controls analysis. The tools that EPA has proposed will result in highly inaccurate results. In particular, an emissions inventory of a short-term fugitive dust event is unreasonable. Emission factors currently available for fugitive dust add a degree of uncertainty to emission estimates when taking into account the short-term nature and exacerbation of high wind on the source. To use an inventory with little or no confidence in the emission rates in source apportionment modeling is ineffective. Additionally, the tools that EPA has specified to perform a back-trajectory will require localized wind fields to be developed. This is not always possible in areas where networks are sparse with large distances (50-100 miles) between meteorological monitoring locations.

#### Clear Causal Relationship

##### Evidence and Analyses Recommended for CCR Demonstration:

The WAQD would like EPA to take into consideration the resources and requirements of states when evaluating elements in this section. Many of the types of information to support these analyses are not available in states with smaller populations and less required monitoring. For instance, the WAQD's network of visibility monitoring is sparse and is not located near the industrial areas where exceedances usually occur. Additionally, the WAQD is only required to have speciated particulate monitoring at one location in the State.

#### No Exceedance "But For" the Event

##### Quantitative NEBF Demonstration:

There are no examples of a quantitative analysis of NEBF included in this document. Without documented examples, the requirement of a quantitative NEBF should be removed from the Guidance.

#### General Comments

##### Definition of Terms:

The WAQD found several terms in the document that should be defined. They are as follows (with page reference included):

- Anthropogenic fires (p.11)
- Severe exceptional events (p.12)
- Mild isolated exceedances (p.12)
- Frequent [exceptional events] (p.12)
- Rare [exceedances] (p.12)
- Stable surfaces (p.3)

In closing, the WAQD would like to thank EPA for their effort in assembling this Guidance Document and giving the states an opportunity to comment. This Guidance is a positive step in clearly identifying elements needed for a successful demonstration of an exceptional event and the WAQD looks forward to guidance on other types of exceptional events in the future. If further clarification is needed on these comments please contact me at 307-777-7391.

Sincerely,



Steven A. Dietrich  
Administrator, Air Quality Division

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