



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

September 30, 2016

Dear Ozone Contingency Plan Participants,

Starting with the winter of 2009, the Wyoming Department of Environmental Quality (WDEQ), Air Quality Division (AQD) has asked that oil and gas operators develop short-term emission reduction contingency plans that can be implemented with one day notice from the AQD of an impending elevated ozone forecast. The Pinedale Anticline Record of Decision (ROD) requires operators to annually develop individual contingency plans to address avoidance of wintertime ozone exceedances.

One of the ten final recommendations from the Upper Green River Basin (UGRB) Air Quality Citizens Advisory Task Force to WDEQ was to "Require contingency plan development and implementation for all oil and gas operators throughout the non-attainment area. Promote expanding contingency plans to other commercial and government entities as practicable." The WDEQ-AQD considered the Task Force recommendations and many other elements in the development of an *UGRB Ozone Strategy* to describe WDEQ's overall ozone reduction strategy. One element in the *Ozone Strategy* dated April 29, 2016 is specific to ozone contingency plans, "Continue to promote the development and implementation of ozone contingency plans, to utilize short-term emissions reduction measures on ozone action days, for all stakeholders throughout the nonattainment area."

Ozone monitoring within the UGRB Ozone Nonattainment area shows that we have gone five winters (2012, 2013, 2014, 2015, 2016) without an ozone exceedance. In addition, EPA published a Final Rule on May 4, 2016 (FR Vol. 81, No. 86: 26697-26722) that included Determination of Attainment for the UGRB by the Attainment Date of July 20, 2015. The final determination of attainment does not constitute a redesignation of attainment. Redesignation will require the WDEQ-AQD to meet a number of additional criteria. The WDEQ-AQD is continuing promotion of the development, and implementation if necessary, of Ozone Contingency Plans (OCPs) for the 2017 winter and encourages all stakeholders to seek additional, innovative solutions to incorporate into this year's OCP to continue to maintain the ozone air quality standard.

OCPs were received last year from three (3) governmental agencies/entities and thirty-two (32) companies within the UGRB. The OCPs identified activities that would reduce emissions that could be implemented upon one-day notice from the AQD of an impending Ozone Action Day (OAD). Examples of ways to reduce emissions on OADs include deferring non-essential construction and maintenance activities, delaying the refueling of vehicles and equipment, and eliminating vehicle idling when possible.

The AQD will again be initiating in-house weather forecasting. Forecasting by the AQD's meteorologists will consist of evaluating the possibility of a strong temperature inversion in conjunction with snow cover, clear skies, and low winds. This is the combination of factors which, when combined with ozone

forming emissions, appear to result in elevated ozone levels. If it is determined that conditions are favorable for the formation of elevated ozone, DEQ will issue an OAD for the UGRB for the following day.

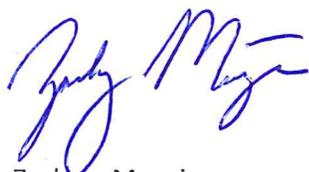
The AQD will continue to utilize the auto-call voice messaging and e-mail systems to notify your company of the potential of the meteorological conditions conducive for elevated ozone and an OAD. Please ensure that the contact information for the individual(s) from your company that you would like to receive this notification are current and up to date, including name, phone number, and e-mail address. If you would like any of your subcontractors to receive this information, please make sure that we have their contact information as well. The WDEQ website, <http://deq.wyoming.gov/aqd/winter-ozone>, will carry daily winter ozone updates (updated at noon everyday) in addition to stating whether an OAD has been issued for the following day.

The WDEQ will again conduct a test-run of our OAD notification mechanisms including the auto-call voice messaging and e-mail systems. A date for the test-run has not yet been established, but I will include more information about the test run of the notification system at the end of October.

As part of your OCP, you should utilize the standardized checklist during an OAD to identify control measures that were used, when they were initiated, for how long, and the responsible party. These standardized checklists will need to be sent in within ten (10) days following each OAD, and will become part of the summary of 2017 winter OAD activities and responses.

At the end of October, I will send out the Wyoming Air Quality Division: Standardized Annual Ozone Contingency Plan form with instructions and ask that you fill them out as your 2017 OCP and return them as well as updated contact information to the AQD by December 1, 2016. Please do not hesitate to contact me at (307)777-6282 or zachary.mangin@wyo.gov if you have any questions about the upcoming 2017 winter ozone season. I look forward to working with everyone in the upcoming months.

Sincerely,



Zachary Mangin

Natural Resources Program Principal

WDEQ-AQD Planning Section