

Agenda

Meeting between:

Environmental Protection Agency Region VIII (EPA),
Wyoming Department of Environmental Quality Air Quality Division (AQD), Wyoming Mining
Association (WMA)

Date: August 16, 2018

Time: 1:00-3:00 PM

Location: Little America Motel, Cheyenne Wyoming

1. WMA Introductory Remarks 10 minutes
Orientations and Safety Contact
Introductions
2. Review Agenda 5 minutes
3. Exceptional Events - Discuss the position of EPA with respect to taking action on Exceptional Event demonstration packages from Wyoming?
 - a. Background – Exceedances can have regulatory significance beyond the control of EPA. Action on demonstration packages is important.
 - b. Examples where inaction by EPA affected a regulatory action.
 - i. A smoke-related PM2.5 exceedance was required to be used in a permitting action in the calculation of background for modeling. This caused the model to show noncompliance.
 - ii. BLM and other federal agencies use the EPA air data in NEPA assessments and documents, leading to misrepresentations of actual compliance record.
 - iii. If exceptional event data is not flagged, it can be used it to challenge industry actions.
 - iv. Wyoming Air Quality Division relies on monitoring to show compliance with 24-hour NAAQS when issuing permits, under the Memorandum of Agreement with EPA. Review and exclusion of exceedances due to exceptional events, as appropriate, is critical to show compliance with short-term NAAQS.
4. Part 58 Monitoring Rules – How is EPA planning to implement the PQAO program for industrial monitors. Can the authority for the program be returned to the Wyoming AQD?
 - a. It is not clear why the rule was promulgated or what it will accomplish, nor why certain authorities previously delegated to Wyoming were rescinded. What can EPA Region 8 do in order to return authorities to the State, and reduce the burdens of this program for which a need has never been demonstrated?
 - b. Quality System approval by two agencies (State and Federal) is inefficient and can result in conflicting determinations and conflicting requests of the operator of an industrial monitor.
 - c. Numerous quality systems for Wyoming industrial monitoring organizations have received concurrence from AQD for Quality System documents, but will be waiting for months before receiving EPA review. This leaves the PQAOs in limbo as to how to comply today.
 - d. WMA requests EPA Region 8 to support the transfer of authority for Technical Systems Audits and Quality System approval as proposed in *Wyoming Ambient Air Monitoring Network Plan 2018*.