



Greg Schaefer
Vice President
External Affairs, Western Region

January 18, 2010

Dr. Holly Stallworth
Designated Federal Officer
EPA Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Submitted via e-mail: stallworth.holly@epa.gov

Dear Dr. Stallworth:

Thank you for the opportunity to make these brief remarks before the CASAC teleconference on the Ozone NAAQS Review. My comments will focus on isolated and sparsely populated areas of the western United States.

Page 1: shows two monitoring stations in Campbell County Wyoming. The Campbell County site is located closer to housing, energy development and transportation, as opposed to the Thunder Basin site, which is considered a background site due to its remote location. The Campbell County site is predominantly upwind of coal mining activities

Page 2: shows the view from the Campbell County site.

Page 3: shows the view from the remote Thunder Basin site.

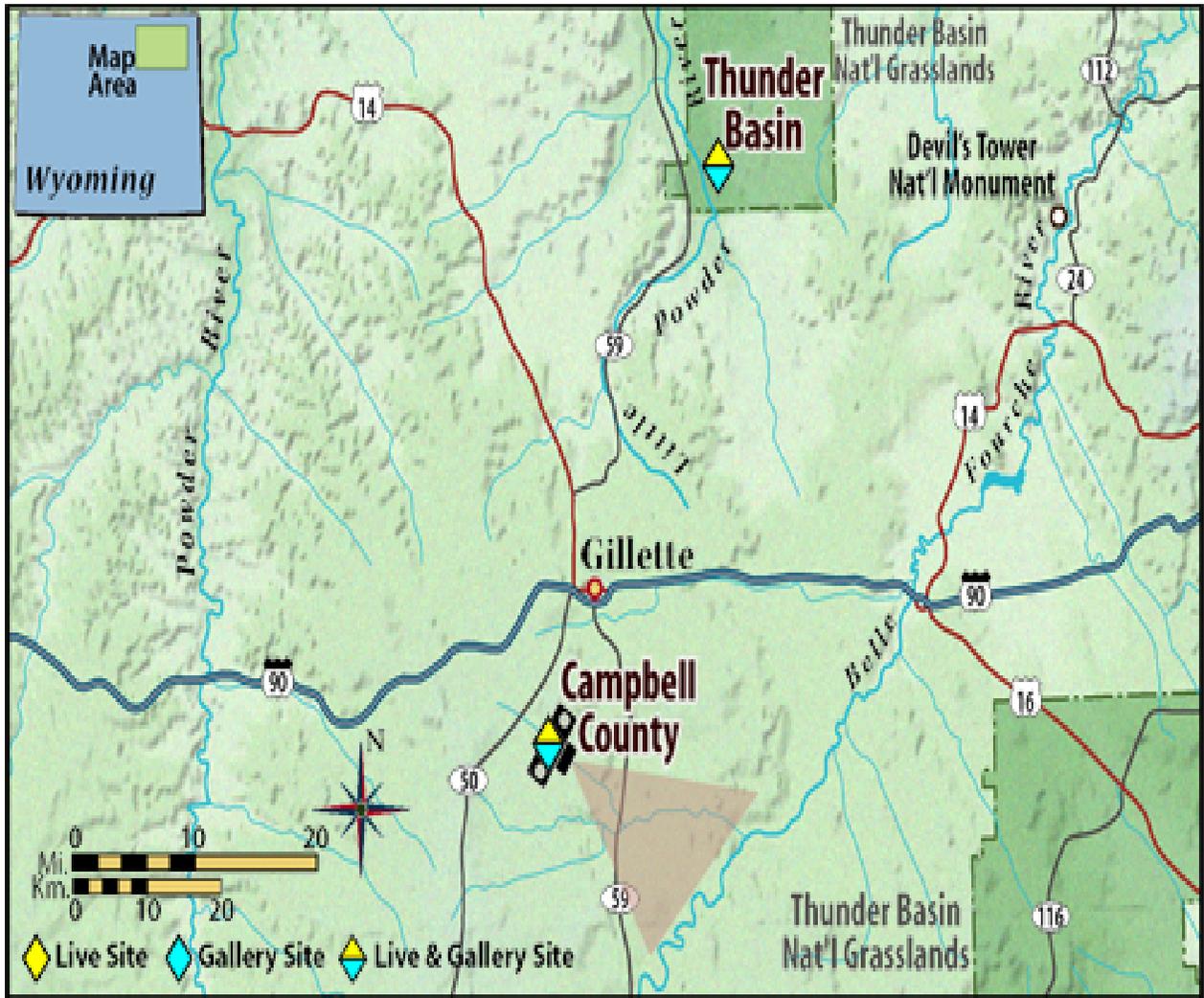
Page 4: shows the 10 highest daily maximum 8-hour averages for 2008 at the remote Thunder Basin site.

Page 5: shows the 10 highest daily maximum 8-hour averages for 2008 at the Campbell County site.

The takeaway is that much of the western United States could be declared non-attainment at the levels proposed by EPA. When a background monitor potentially exceeds the ozone standard there is a problem, as there is little opportunity to reduce the levels of ozone. This problem is compounded if the source of the ozone comes from wild or prescribed fires.

Sincerely,

Greg Schaefer





Greg Schaefer
Vice President
External Affairs, Western Region

Campbell County, Wyoming Ozone Monitor Location



Thunder Basin National Grasslands Ozone Monitor Location





Greg Schaefer
 Vice President
 External Affairs, Western Region

Source: Wyoming Department of Environmental Quality, Air Quality Division

Ozone Summary of the Highest Daily Maximum 8-Hour Averages Thunder Basin National Grasslands Final Validation 01/01/2008 - 12/31/2008		
Date	Start and End Time of Daily Maximum 8-Hour Average	Daily Maximum 8-Hour Average (ppb)
08/01/2008	10 - 17	71
06/30/2008	13 - 20	70
07/04/2008	10 - 17	68
06/03/2008	11 - 18	66
07/29/2008	10 - 17	65
08/07/2008	09 - 16	65
03/13/2008	11 - 18	64
05/29/2008	13 - 20	64
07/26/2008	10 - 17	64
05/05/2008	10 - 17	63
0	Days this period with 8-hour averages > .075 ppm (75 ppb)	



Greg Schaefer
 Vice President
 External Affairs, Western Region

Source: Wyoming Department of Environmental Quality, Air Quality Division

Ozone Summary of the Highest Daily Maximum 8-Hour Averages Campbell County Final Validation 01/01/2008 - 12/31/2008		
Date	Start and End Time of Daily Maximum 8-Hour Average	Daily Maximum 8-Hour Average (ppb)
05/23/2008	15 - 22	69
08/09/2008	10 - 17	66
07/18/2008	10 - 17	64
07/27/2008	10 - 17	64
08/19/2008	10 - 17	64
07/21/2008	11 - 18	63
08/05/2008	10 - 17	63
08/06/2008	09 - 16	63
07/24/2008	09 - 16	62
08/07/2008	09 - 16	62
0	Days this period with 8-hour averages > .075 ppm (75 ppb)	