

WYOMING TRUCKING ASSOCIATION, INC.

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Sheila D. Foertsch, Managing Director

August 6, 2009

Mr. Dennis Boal
Chairman, Environmental Quality Council
122 West 25th Street
Herschler Building, Room 1714
Cheyenne, Wyoming 82002

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Jim Ruby, Executive Secretary
Environmental Quality Council

RE: Docket #09-1101

Dear Mr. Boal:

The Wyoming Trucking Association, Inc. appreciates the opportunity to comment on Docket #09-1101, the proposed Crumpley et al Citizen Petition for Air Quality Rulemaking.

The Wyoming Trucking Association, Inc. has membership of 544 business entities, representing vendors as well as trucking companies, many of whom service the oil and gas industry in the state of Wyoming.

The proposed changes, will have both direct and indirect implications on members of Wyoming Trucking Association and we request that the Environmental Quality Council (Council) deny the petition.

EPA is currently reviewing the current ozone standard nationwide. Why would the Council request the state agency responsible for such standards to evaluate the same standard for one county in Wyoming at the same time? EPA has far more expertise, experience, access to scientific studies and available staff to make an informed decision regarding the proper levels of ozone that they believe to be protective upon lengthy and informative reviews of data and comments received.

Recent and upcoming changes in diesel engine regulations have and will continue to dramatically reduce diesel engine emissions. A new on-road diesel engine

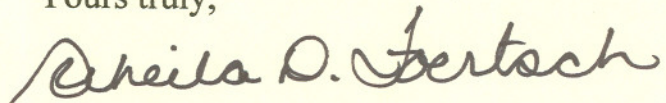


purchased today produces half of the ozone-forming emissions (NO_x + HC) of a similar engine purchased just three years ago. And next year, these same diesel engines will produce even less ozone-forming emissions, completing a nearly 90 percent reduction over a four-year period. New large off-road diesel engines (50 hp or greater) have also reduced ozone-forming emissions by nearly 40 percent over the past three years – with further reductions required within the next four years. The oil and gas industry in Wyoming have been proactive in reducing numerous types of emissions from numerous sources, both through regulation and voluntarily.

We believe the State Implementation Plan is the best way to address the current non-attainment issue in Sublette, Lincoln and Sweetwater counties and should be allowed to proceed without unnecessary distractions that would take staff time and effort away from the task at hand. We question whether tying up limited resources within the Department of Environmental Quality on a rulemaking to address a standard for a limited area in the state is beneficial to meeting overall air quality benefits for Wyoming.

Thank you for your consideration of these comments.

Yours truly,



Sheila D. Foertsch
Managing Director

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