United States Department of Agriculture

Forest Service

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Mr. Bernie Dailey
Air Quality Division
Department of Environmental Quality
122 West 25th Street
Cheyenne, WY 82002

Dear Mr. Dailey:

This letter is in regard to the Prevention of Significant Deterioration (PSD) permit application for the proposed expansion of the Solvay soda ash facility. We are pleased to note that the facility will offset the NOx emissions increase from the expansion.

As you are aware, the Forest Service is very concerned about the impact that cumulative emissions from southwest Wyoming sources may have on Class I areas such as the Fitzpatrick wilderness and the Bridger wilderness. Increasing emissions of Volatile Organic Carbon (VOC) and other condensible emissions from sources in southwest Wyoming are becoming a rapidly escalating concern for the Forest Service. The net emissions increase of 3298 Tons Per Year VOC that Solvay is requesting, in conjunction with other concurrent and upcoming VOC increases from other soda ash and oil and gas facility development may have the potential to produce a significant impact to visibility in the Class I wilderness areas.

However it is impossible for the Forest Service to accurately assess the potential impact of these sources concurrent increase in VOC emissions without a cumulative impacts assessment. As shown in Figure 2-1 in the Solvay PSD permit, Solvay and four other soda ash facilities are located within about a 12 mile radius of each other. Therefore, we request that the State of Wyoming considers the Solvay permit to be incomplete until either the proponent or the Southwest Wyoming Technical Air Forum (SWWYTAF) conducts a modeling analysis to determine the contribution of these five trona facilities and other locally contributing sources to visibility impairment in the Bridger and Fitzpatrick Class I wilderness areas.