



The State
of Wyoming



Department of Environmental Quality

Dave Freudenthal, Governor

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January 26, 2004

Mr. Mark Friedrichs, PI-40
Office of Policy and International Affairs
U.S. Department of Energy
Room 1E190
1000 Independence Ave, S.W.
Washington, D.C. 20585

RE: Comments on 1605(b) General Guidelines for Voluntary Reporting of Greenhouse Gas Emissions

Dear Mr. Friedrichs:

The Air Quality Division of the Wyoming Department of Environmental Quality has reviewed the Draft 1605(b) General Guidance for the voluntary reporting of greenhouse gas emissions. The Division is pleased with the efforts of the Energy Information Administration (EIA) to track the voluntary reporting of greenhouse gas emissions and will continue to participate in the development process by commenting when appropriate. The Division's specific comments on the draft guidance follow.

As the regulatory authority responsible for management of air quality in the State of Wyoming, the Air Quality Division must be copied on submittals by entities and on EIA responses to submittals. The Division suggests adding provisions to Sections 300.9 (Reporting and Recordkeeping Requirements) and 300.12 (Acceptance of Reports and Registration Requirements) that communications be copied to the applicable air quality regulatory authority in their respective state.

Quantified emissions levels are set forth in this document in several places, for example, to distinguish between large and small emitters or as de minimis for large emitter reporting. It is difficult to meaningfully comment on these levels without the Technical Guidance Document that demonstrates how emissions will be calculated; the Technical Guidance will give reviewers a clearer picture of which sources may be excluded by implementing these levels. As a result, the Division will refrain from commenting on these levels until the Technical Guidance is released.

If you should have any questions regarding the comments, please feel free to contact this office.

Sincerely,

John Corra
Director, Wyoming Department of Environmental Quality

Cc: Dan Olson, Air Quality Division Administrator
Gary Beach, Industrial Siting Administrator
Cara Casten, Air Quality Division
Tami Romsa, State Planning Office