

Appendix F – State of Oklahoma DEQ Support Letter

STEVEN A. THOMPSON
Executive Director



OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

October 23, 2012

Ms. Rebecca Weber, Director
Air and Waste Management Division
US EPA Region 7 (AWMDIO)
901 North 5th Street
Kansas City, KS 66101

Dear Ms. Weber:

The State of Oklahoma is submitting this letter in support of the State of Kansas in their request for concurrence for multiple exceptional events that occurred in the spring of 2011.

Oklahoma has reviewed the exceptional event demonstration package submitted by the State of Kansas for the dates of April 6, 12, 13, and 29, 2011. We find the demonstration to be complete, accurate, and in accordance with our own findings on many of the same dates.

Throughout the month of April 2011, the State of Oklahoma experienced many ozone exceedences due to uncontrolled wildfires and the seasonal agricultural burns in the Flint Hills region of Kansas. The wildfires, some from as far away as southern Texas and New Mexico, exacerbated by severe drought and high winds, contributed significantly to these ozone events. We strongly believe these exceedences would not have occurred but for the presence of the fires.

Before the onset of the summer of 2011, Oklahoma was investing significant resources preparing a similar demonstration for dozens of exceedences we found to be outside the historical norms for the month of April. By the end of the summer, however, our April events became irrelevant as summer ozone values far exceeded those we experienced in the spring. Our continued pursuit of exceptional events was no longer necessary, as they would not be used in determining our attainment status.

We expect similar uncontrollable events can and will occur in Oklahoma in the future, possibly at a time when our attainment status will be affected. When that time comes, we are confident we will be able to demonstrate, as Kansas has capably done for the April events of 2011, that these fire-related ozone events are exceptional.

Sincerely,

A handwritten signature in blue ink that reads "Laura Finley".

Laura Finley
Environmental Attorney

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