STATE OF COLORADO

CDPHE - AQCC Comments - CDPHE, cdphe <cdphe.aqcc-comments@state.co.us>

Regulation 7 Comments

1 message

Peggy Donahue <summits49@yahoo.com> Sat, Jun 9, 2018 at 2:19 PM
To: "cdphe.aqcc-comments@state.co.us" <cdphe.aqcc-comments@state.co.us>

Sample Comment - Please feel free to adapt as you would like. Dear Commissioners, Thank you for the opportunity to provide comments as part of your consideration of proposed revisions to Regulation Number 7. This rule making process is an important first step in ensuring healthy air for Coloradans. The Front Range is currently in violation of the federal ozone standard that protects public health, posing a significant health risk to children, seniors, and people with asthma. And a big contributor to the ozone pollution is the oil and gas industry. According to a recent study, each summer kids are suffering more than 30,000 asthma attacks in Colorado that are linked to smog pollution from oil and gas development Colorado has been a leader in adopting regulations to address ozone and methane pollution from the oil and gas industry that have served as a model for other states and the federal government. Because of Colorado’s lingering smog problem, more must be done to protect public health and the environment. We have an opportunity for our state to be a leader once again. There are cost-effective solutions to reduce ozone and methane pollution associated with drilling,

such as requiring companies to find and fix leaks at least twice a year at all of their wells, requiring operators to directly measure emissions from pneumatic devices to ensure that they are operating properly, and requiring the use of no-bleed pneumatics where it is technically and economically feasible to do so. There is no reason that these standards should not apply statewide, protecting the health of all Coloradans and reducing greenhouse gas emissions. For the past three years, the leak detection and repair program in Colorado has been a huge success. It has prevented thousands of tons of methane, volatile organic compounds, and cancer-causing benzene from being emitted into the atmosphere. Because the methane (natural gas) is kept in the pipeline rather than being emitted into the air, the regulations have saved the industry money! We also know that oil and gas accidents do happen. There is an average of one fire or explosion at these facilities every month in Colorado. Additional leak inspections could ultimately save lives. On the Front Range, where wells can be sited as close as 500 feet from homes, increased inspections are critical to public health and safety. Thank you, Your Name Your Address

STATE OF COLORADO

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Regulation of nitrogen oxides

1 message

Duskey Mallory <duskeym@comcast.net> Tue, Jun 19, 2018 at 2:59 PM
Reply-To: Duskey Mallory <duskeym@comcast.net>
To: cdphe.aqcc-comments@state.co.us

To: Colorado Air Quality Control Commission

Colorado Dept. of Public Health and environment

From: Duskey Mallory

Date: June 19, 2018

Subject: Regulation of nitrogen oxides

In preparation for your scheduled rule-making hearing on July 19, I submit this call to action, urging you to take immediate steps to reduce hazardous ozone air pollution levels in Jefferson County.

The polluting nitrogen oxides, with the ozone they help create, are a dangerous air pollutant in our county. Although my husband and I do not suffer from the results of our air pollution, we have neighbors who do. An example is a couple across the street, both fit and of normal weight. He recently had a heart attack and she has lung problems and now must use an oxygen machine much of the time, especially when she goes to the gym. And a young woman next door must severely limit the time she spends outdoors.

In a state as wonderful as Colorado, where so many of our residents love to enjoy the beauty of being outside, it is truly a shame that Jefferson County residents must suffer from the extreme danger of nitrogen oxides.

Please take action and adopt regulations that will limit the release of polluting nitrogen oxides.

Thank you.

Duskey Mallory

6187 Reed Way

Arvada, CO 80003

duskeym@comcast.net

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Comments: Nitrogen Emissions from Stationary Combustion Equipment

1 message

League of Women Voters of Jefferson County <lwvjeffersoncountyco@gmail.com> Wed, Jun 20, 2018 at 3:09 PM
To: cdphe.aqcc-comments@state.co.us
Cc: League of Women Voters of Jefferson County <info@lwvjeffco.org>, June LeCrone <junelecrone@gmail.com>, Sandra Schuster <sandyutcu@gmail.com>

Please accept the following wrien comments on the proposed revisions and addions to regulaons that would reduce nitrogen oxide emissions from staonary combuson equipment from the League of Women Voters of Jefferson County, CO.

Sent By: June LeCrone, President
League of Women Voters of Jefferson County
1425 Brentwood St, Suite 7, Lakewood CO 80214
303-238-0032
info@lwvjeffco.org / www.lwvjeffco.org

Dated: June 20, 2018

The League of Women Voters of Jefferson County urges your support of the strongest possible regulaons relang to staonary combuson equipment sources of nitrogen oxides (NOx) in the Denver Metro and North Front Range Nonaainment Area.

The posion of the League of Women Voters at both Naonal and Colorado levels for many years has been in support of increased regulaon of and reducon of dangerous air pollutants.

Your "AQCC 2016-2017 Report to the Public" at https://www.colorado.gov/pacific/cdphe/aqcc-2016-2017-report-public describes how nitrogen oxides, together with volale organic compounds in the presence of sunlight create ozone. And as that Report states on page 6, "Ozone can cause breathing difficules and respiratory infecons in the elderly, the young and those with pre-exisng ailments such as asthma, and can cause premature mortality."

According to the American Lung Associaon (ALA) mulple large studies confirm that breathing ozone, even at low levels, may cause premature death. These deaths, as well as lesser damage to health, resulng from heart aack, stroke, COPD, asthma and other pulmonary and cardiovascular condions. Those most at risk are children, those over 65, people who work or exercise outdoors, and those with the health condions just listed. http://www.lung.org/our-initiatives/healthy-air/outdoor/air-pollution/ozone.html.

The ALA in its "State of the Air (SOTA) Report for 2018" http://www.lung.org/our-initiatives/healthy-air/sota/ provides detailed ozone data on Jefferson County and the Denver metro area. It reports that the Denver metro area ranks 14th worst for ozone among 227 metropolitan areas in the naon and when California's cies are excluded ranks fih worst of metropolitan areas for ozone in the naon.` http://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/most-polluted-cities.html

ALA's SOTA reports further that Jefferson County has the worst ozone levels by a wide margin of any other county in the metro area, and indeed the state. It reports that for the most recent year, Jefferson County suffered 48 late spring and summer days in which ozone was at levels unhealthy for sensive groups (those people listed in the second paragraph above) and that for five addional days of the season ozone was at levels unhealthy for everyone. http://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/states/colorado/. Thus for 53 days, most of the days that exist between Memorial Day and Labor day when people are most likely to be enjoying Colorado outdoors, a large poron of those in Jefferson County and elsewhere along the edge of the foothills are unknowingly placing their health and even their lives at risk when they use those days to engage in vigorous outdoor acvity.

All of these ozone data are taken by the ALA from the Colorado Department of Public Health and Environment's own tesng staons and are reported through the US Environmental Protecon Agency using EPA ranking criteria. The reason that Jefferson County and other areas along the foothills has such appalling ozone numbers is, as you know from your State Implementaon Plan (SIP) and elsewhere, because ozone, being heavier than air, seles and accumulates against and into the foothills which it cannot climb.

The League of Women Voters of Jefferson County urges the AQCC to take acon to reduce nitrogen oxide levels from staonary combuson equipment sources thereby reducing Colorado's ozone levels to protect beer the health and lives of the people of Jefferson County and all of Colorado.

--END of Comments--

From: Ruth Hund
To: cdphe.aqcc-comments@state.co.us
Subject: July 19 Rulemaking for nitrogen oxides
Date: Friday, June 22, 2018 9:56:11 AM

To the Air Quality Control Commission:

I urge you to promulgate the strictest possible limits for nitrogen oxides from stationary combustion equipment. Having received my Master of Science in Environmental Science and Engineering at the Colorado School of Mines, I know that nitrogen oxides catalyze the formation of ozone. They are also the cause of the ugly brown cloud that hangs over our front range valleys including Denver and Boulder. As an athlete and an asthma patient, I must limit my activity on high ozone days. I can only imagine what I will have to do as I age. High ozone triggers cardiac events and can be fatal to those who are susceptible.

In addition, and more importantly, nitrogen oxides are a powerful greenhouse gas, many times more powerful than carbon dioxide or methane. Our world is warming at an alarming rate. We are seeing the effects with more extreme weather events and beetle kill of our forests, just to name two. Most of the state of Colorado is under extreme drought conditions due to climate change, which is due to greenhouse gas emissions. With the horrible beetle kill that I observed in a recent trip to the San Juan National Forest and the drought conditions there, we are in for an unprecedented fire season.

Please do not let the recently mild weather in the Denver area fool you. The rest of the state is in dire straits. Forest fires will not only cost millions of dollars in fighting the fires and damage to structures, but also cut dramatically into tourist revenue. In fact, it already has. On my recent, aforementioned trip, it was eery to drive past San Juan National Forest entrances and see them closed off. If people cannot enjoy our natural wonders, they will not come and buy gas, groceries, or stay at our hotels.

Thank you for your consideration of my comment-

Ruth L. Hund

698 Partridge Circle
Golden, CO 80403
303-949-9029
ruth.hund@gmail.com

From:	Karil Frohboese
To:	cdphe.aqcc-comments@state.co.us
Subject:	Comments about the proposed regulation of nitrogen oxides
Date:	Friday, June 22, 2018 10:26:29 AM

Dear AQCC Commission Members,

I urge you to support the very strongest regulations that would limit the release of polluting nitrogen oxides from stationary combustion equipment in the Denver Metro North Front Range Area.

Your 2016-2017 Report to the Pubic describes how nitrogen oxides, together with volatile organic compounds in the presence of sunlight, create ozone, which can cause breathing difficulties and respiratory infections in the elderly, the young and those with pre-existing ailments such as asthma, and can cause premature mortality. And, as you know, nitrogen oxides, in addition to the immediate damage they do through ozone, are a powerful greenhouse gas, multiple times stronger, pound for pound, though present in smaller quantities, than either methane or carbon dioxide.

As a resident of Jefferson County I am very concerned about the conditions here. Jefferson County has the worst ozone pollution levels in Colorado and is among a collection of a modest number of counties that are the worst for ozone in the nation.

Please take action to protect the health of all of us in Colorado.

Sincerely,

Karil Frohboese
karil.f@comcast.net
2977 Sun Creek Ridge
Evergreen, CO. 80439
303-670-8551

From: Marilyn T. Brown
To: cdphe.aqcc-comments@state.co.us
Date: Sunday, June 24, 2018 10:01:09 AM

I am writing today in reference to the rule-making hearing to be held on July 19 on 'Proposed adoption of (needed) regulations that would limit the release of polluting nitrogen oxides from stationary combustion equipment in the Denver metro and north Front Range area." I urge you to support the strongest possible regulations relating to stationary combustion equipment sources of nitrogen oxides (NOx) in the Denver Metro and North Front Range Nonattainment Area.

We live in unincorporated Jefferson County and I am an alpha-1 anti-trypsin carrier as is my daughter who lives in Arapahoe County. As such, we must be careful to avoid breathing irritants which can cause bronchiectasis and increase the likelihood that we will pick up bacterial infections from the environment, like MAC, which I currently have. As DNA testing services become more popular, I believe more and more people will learn that they have this or other lung-related genetic histories, especially those of us of northern European heritage. We all need your help to keep the atmosphere as clean as possible in order to preserve our health and avoid the expense of dealing with these lung diseases.

In addition, a few years ago a Durango friend who was considering moving to the north metro area of Denver with her husband decided to stay in Durango when she learned about the non attainment status of that area with respect to ozone.

Please adopt the strongest regs possible for pollution of nitrogen oxides from any sources in CO.

Marilyn Brown
4559 S Taft Way
Morrison, CO 80465
970-946-6523

From: gene collins
To: cdphe.aqcc-comments@state.co.us
Subject: proposed regulation of nitrogen oxides
Date: Sunday, June 24, 2018 12:03:14 PM

My name is Eugene Collins and live at 16708 Foxtail Ct. Morrison, 80465. As a Jefferson County resident for the past 38 years I have seen many changes. Of course, one is the quality of the air in the Denver Metropolitan area but it is a known fact that there are more air concerns in the JeffCo region due to its close proximity to the mountains.

Personally, I see an increase of asthma among my friends and neighbors in recent years. This is not necessarily due to aging because these are very active adults who are consistently caring for their health conditions. One of these folks was just diagnosed with his asthma having increased to a level of serious COPD.

I wanted to support any efforts you can take to continue the control and decrease of all air pollutants. Governor Hickenlooper has, along other states, taken the position of California regarding automobile standards in new cars.

Thank you for your time given to consideration of these important regulations. Gene Collins

From:	Bette Seeland
To:	cdphe.aqcc-comments@state.co.us
Subject:	Nitrogen oxides emissions regulations
Date:	Sunday, June 24, 2018 2:10:08 PM

June 24, 2018

To: Colorado Air Quality Control Commission (AQCC)

cdphe.aqcc-comments@state.co.us

From: Bette and David Seeland

47 Flower Street, Lakewood, CO 80226

blseeland@yahoo.com

Re: Proposed regulations limiting nitrogen oxides emissions

We urge the AQCC to adopt the strongest possible limits of nitrogen oxides (NOx) emissions from stationary combustion equipment sources.

We are aware that NOx's contribute to the creation of ozone and the damage ozone can cause to citizens' health. The Denver metro area and Jefferson County rank among the worst in the nation for high ozone levels.

As senior citizens (80 years of age), we regularly walk over ten miles a week in our local neighborhood parks and our excellent Jefferson County Open Space Parks. This places us in areas in and along the foothills where ozone concentrations can be at the highest levels.

We strongly support action by the Air Quality Control Commission to tighten the regulation of nitrogen oxides from stationary combustion equipment sources to lower ozone levels in Colorado and to help protect the health of our citizens.

From: Randy Duncan
To: cdphe.aqcc-comments@state.co.us
Subject: Nitrogen Oxide Emissions
Date: Sunday, June 24, 2018 6:54:38 PM

Hello,

I live in Golden Colorado and it's my opinion that nitrogen oxide emissions from fixed emitters should be reduced in the Denver and northern Colorado areas. Where I live in Golden, there are many days when ozone levels are above those suggested for a healthy environment. Any help you give me and my family will be greatly appreciated.

Randy Duncan
913 Cheyenne St.
Golden, Colorado 80401
720-989-7262

STATE OF COLORADO

CDPHE - AQCC Comments - CDPHE, cdphe <cdphe.aqcc-comments@state.co.us>

NOx Rule making, feedback from Don Cameron - Golden, CO

1 message

Don Cameron <cameron2021don@gmail.com> Tue, Jun 26, 2018 at 10:22 AM
To: cdphe.aqcc-comments@state.co.us

First of all I want to thank you for including the "Statements of basis, Specific Statutory Authority and Purpose" statement in your document "https://www.colorado.gov/pacific/sites/default/files/SOS-2018-Reg7-RMH-Notice-071918-DORA.pdf" I found this very readable and useful. Among the things that I want to encourage take place in the final rule making are:

No de-rating - I would strongly encourage the use of RACT, and not de-rating heat equipment as way to meet the NOx emissions. No exemptions allowed please.
RACTs - I would strongly encourage the use of RACTs on existing equipment, but also would encourage you to require RACTs on new equipment. While that seems obvious, I did not see that mentioned in the rule making.
Point Sources versus Stacks - The rule making seems to be specific to equipment that is the source of emissions, but then goes to say that combined stacks have to have emissions allocated. While I think there is no loophole here, I would worry about a company claiming no machine violates 5 tpy, but a combined stack could well exceed 5 tpy. This should be specifically disallowed. A stationary source, to an outside observer is just a physical location, which could be a stack. If a stack exceeds 5 tpy, then I think RACT should be implemented regardless if the individual sources don't exceed that level.
5 tpy limit - I recently wrote in about the Coors Tek air permit and was not surprised that they were being held to a 50 tpy limit on HAS, and had just squeaked under the limit with over 49 tpy. I am likewise concerned that a number of companies will now declare exemptions because they are just slightly under the 5 tpy limit. Additional scrutiny I think should take place for anything above 4 tpy until a track record of honest reporting and thorough analysis is completed. Track records of failing these limits in the past is enough doubt for this citizen to not trust companies going forward.

Sincerely, Don Cameron, concerned citizen, representing "self".
--

Don Cameron
303-523-0783
2021 East St.
Golden, Colorado

June 22 2018

To: Colorado Air Quality Control Commission, Colorado Department of Public Health and Environment,

4300 Cherry Creek Drive South
EDO-AQCC-A5
Denver, Colorado 80246

From Karen Groves
28350 Douglas Park Rd.
Evergreen, CO
303-670-1275

Dear AQCC Commission Members,

I urge you to support regulations to limit the release of polluting nitrogen oxides from stationary combustion equipment in the Denver Metro North Front Range Area.

Your 2016-2017 Report to the Pubic describes how nitrogen oxides, together with volatile organic compounds in the presence of sunlight, create ozone, which can cause breathing difficulties and respiratory infections in the elderly, the young and those with pre-existing ailments such as asthma, and can cause premature mortality.

As you know, nitrogen oxides, in addition to the immediate damage they do through ozone, are a powerful greenhouse gas, multiple times stronger, pound for pound, though present in smaller quantities, than either methane or carbon dioxide.

As a resident of Jefferson County I am very concerned about the conditions here. Jefferson County has the worst ozone pollution levels in Colorado and is among a collection of a modest number of counties that are the worst for ozone in the nation.

Please take action to protect the health of all of us in Colorado.

Sincerely,
Karen T. Groves

STATE OF COLORADO

CDPHE - AQCC Comments - CDPHE, cdphe <cdphe.aqcc-comments@state.co.us>

Message to AQCC

1 message

Gwyn Green <gwyngreen@comcast.net>
Reply-To: Gwyn Green <gwyngreen@comcast.net>
To: cdphe.aqcc-comments@state.co.us

Wed, Jun 27, 2018 at 6:02 PM

This message is in reference to the AQCC's proposed regulation of nitrogen oxides. I urge adoption of the strictest possible limits, especially as I and so many others have asthma which is brought on by particulate matter, smog and ozone. I live in Golden, Colorado, which is right up against the mountains of the front range, and all of the pollution from Denver blows up against these mountains and settles over Golden. Many times, I have had great difficulty breathing. I have had to use a rescue inhaler and a breathing machine so that I can breathe.

In particular, I remember with sadness and horror the little eight year old boy who died of asthma because he could not get to a hospital soon enough.

For the sake of all children and all adults, I ask you to set these strictest limits possible of nitrogen oxides.

Thank you very much.

Sincerely,

Gwyn Green

STATE OF COLORADO

CDPHE - AQCC Comments - CDPHE, cdphe <cdphe.aqcc-comments@state.co.us>

Dangerous Ozone Pollution in Jefferson County

1 message

kenpatm@aol.com <kenpatm@aol.com> Fri, Jun 29, 2018 at 9:34 PM
To: cdphe.aqcc-comments@state.co.us

Dear Air Quality Control Commission:

I am aware that you will be holding a public rule-making hearing on July 19, 2018. I want to urge you to take immediate action in order to reduce the ozone pollution in Jefferson County. Please adopt whatever the necessary regulations might be which would reduce the nitrogen oxides being released into our atmosphere.

My husband and I have lived in south Jefferson County for almost 50 years. We raised our children here and have two grandchildren here. We have always believed we were living in a safe place. Now we find that the American Lung Association reports that numerous studies have found that ozone levels in Jefferson County are often found to be high enough to contribute to heart attacks, breathing difficulties and more. Furthermore nitrogen oxides are powerful greenhouse gases.

Please do the responsible thing and adopt the strictest possible limits on the release of polluting nitrogen oxides.

Patricia F. Mesec
5200 West Ottawa Ave.
Littleton, Colorado 80128
kenpatm@aol.com