



STATE OF UTAH
 OFFICE OF THE GOVERNOR
 SALT LAKE CITY, UTAH
 84114-2220

GARY R. HERBERT
 GOVERNOR

To: OPRA
 Action if necessary
 CC: Carol R.
 Ultra only
GREG BELL
 LIEUTENANT GOVERNOR

October 12, 2009

Carol Rushin, Acting Regional Administrator
 U. S. Environmental Protection Agency, Region 8
 1595 Wynkoop Street
 Denver, CO 80202-1129

Dear Ms. Rushin:

The revised national ambient air quality standards (NAAQS) for lead promulgated in October 2008 require that by October 15, 2009, states make recommendations to the Environmental Protection Agency for areas to be designated attainment, nonattainment, or unclassifiable based on ambient lead monitoring data collected between 2006-2008.

The State of Utah recommends that all 29 counties in Utah be designated unclassifiable for the primary and secondary lead standards. With approval from EPA Region 8, the State has not monitored for lead in the ambient air since September 2005. Lead monitoring was halted because measured levels of lead were extremely low relative to the former primary and secondary lead standards (1.5 µg/m³ quarterly average). Consequently, insufficient information is available to determine the current attainment status of each area of Utah. If a violation of the lead standard is measured at any lead monitoring site before EPA issues its final designations, the State will submit a revised recommendation to the Agency as expeditiously as possible.

We look forward to working with you and your staff to implement the revised lead standards in Utah. Should you have questions, please contact Cheryl Heying, Director, Utah Division of Air Quality, (801) 536-4022.

Sincerely,

Gary R. Herbert
 Governor

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 U.S. EPA Region 8
 RA's Office
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Enclosure

Overview of Lead Monitoring Data in Utah

The EPA has revised the level of both the primary and secondary lead NAAQS to $0.15\mu\text{g}/\text{m}^3$ to improve health protection for at-risk groups, especially children. An area is considered in compliance with the revised lead standard if measured lead concentrations do not exceed $0.15\mu\text{g}/\text{m}^3$ during a rolling three-month averaging period evaluated over three years. Table 1 shows lead values averaged over rolling three-month periods at the Magna site (AIRS code: 49-035-1001) for the most recent three-year monitoring period (2002-2005). Each lead sample was collected over a 24-hour sampling period (from midnight to midnight) every sixth day at the site. On average, 15 samples were collected during each three-month averaging period. Magna is the only site where ambient lead concentrations were measured in the State's air monitoring network during the past five years. No additional lead monitoring data have been collected in the State by the EPA, local, or tribal agencies during this period and submitted to EPA's national database, AQS.

Table 1: Rolling Three-Month Averaged Lead Concentrations Measured at Magna Site from October 2002 to September 2005, in $\mu\text{g}/\text{m}^3$

Period	Pb Conc.*	Period	Pb Conc.*	Period	Pb Conc.*
Aug-Oct 02	.03	Aug-Oct 03	.04	Aug-Oct 04	.02
Sep-Nov 02	.04	Sep-Nov 03	.04	Sep-Nov 04	.04
Oct-Dec 02	.04	Oct-Dec 03	.06	Oct-Dec 04	.06
Nov 02-Jan 03	.07	Nov 03-Jan 04	.07	Nov 04-Jan 05	.09
Dec 02-Feb 03	.07	Dec 03-Feb 04	.08	Dec 04-Feb 05	.10
Jan-Mar 03	.06	Jan-Mar 04	.07	Jan-Mar 05	.08
Feb-Apr 03	.03	Feb-Apr 04	.04	Feb-Apr 05	.05
Mar-May 03	.02	Mar-May 04	.04	Mar-May 05	.02
Apr-Jun 03	.02	Apr-Jun 04	.02	Apr-Jun 05	.02
May-Jul 03	.02	May-Jul 04	.02	May-Jul 05	.02
Jun-Aug 03	.02	Jun-Aug 04	.02	Jun-Aug 05	.02
Jul-Sep 03	.02	Jul-Sep 04	.02	Jul-Sep 05	.02

* Three-month rolling averages are rounded to two decimal places as required by federal regulations.

None of these three-month rolling averages exceeds the revised lead standard. The highest three-month average occurred between December 2004 and February 2005 when the 15 collected samples averaged $0.10\mu\text{g}/\text{m}^3$. 1989 was the last time an average lead level of $0.15\mu\text{g}/\text{m}^3$ was measured at the site during any three-month period. The lead monitors were removed from Magna at the end of September 2005 because ambient concentrations of the pollutant were consistently low relative to the existing primary and secondary lead standards. Monthly lead concentrations had averaged less than one-tenth of NAAQS over a 15-year monitoring period at the site (1990-2005). Nationally and locally, lead levels in the ambient air have been reduced dramatically in the past three decades. UDAQ's former monitoring station in downtown Salt Lake City showed a 97% decrease in ambient air lead measured over an 18-year monitoring period (1982-1999), mirroring national trends. These dramatic reductions are attributable to EPA's lengthy regulatory efforts to remove lead from gasoline (1973-1996).