



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQP-037-16

May 17, 2016

Monica Morales
Air Program Director
US EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

Re: Utah Division of Air Quality 1-Hour Sulfur Dioxide Data Requirement Rule Modeling Demonstration

Dear Ms. Morales:

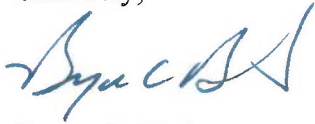
On February 9, 2016, the Utah Division of Air Quality (UDAQ) submitted a modeling protocol outlining the State's approach to conducting dispersion modeling for the Environmental Protection Agency (EPA) – Sulfur Dioxide Data Requirement Rule (SO₂ DRR) for attainment demonstrations. On March 1, 2016, EPA provided comments on the protocol. On March 22, 2016, UDAQ submitted an addendum that served to address EPA's comments. On April 4, 2016, EPA acknowledged receipt of the modeling protocol and addendum, and concluded that, "the State's approach to conducting dispersion modeling for EPA's SO₂ DRR aligns with EPA's guidance, and sufficient information has been provided to EPA Region 8 for the State to proceed with the dispersion modeling using the methodology outlined in these documents," thus satisfying the requirements outlined in 40 CFR Part 51.1203(d).

UDAQ is hereby submitting the attached 1-Hour Sulfur Dioxide Data Requirement Rule Modeling Demonstration (Modeling Demonstration). As the Modeling Demonstration makes clear, UDAQ has chosen to characterize peak 1-hour SO₂ concentrations in each of the source areas identified in the list submitted to EPA on January 8, 2016, through air quality modeling techniques, thus satisfying the requirements outlined in 40 CFR Part 51.1203(b). As noted in the Modeling Demonstration, "The results of the dispersion modeling analyses for the Intermountain Power Services Corporation Power Plant, and the PacifiCorp Hunter and Huntington Power Plants, indicate that the 1-hour SO₂ NAAQS would be in attainment in the areas surrounding the

facilities.” Thus, the Modeling Demonstration satisfies the modeling analysis submittal requirements outlined in 40 CFR Part 51.1203(d)(3).

Should you have any questions or need any further information, please contact Tom Orth of my staff at (801) 536-4005 or torth@utah.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryce C. Bird".

Bryce C. Bird
Director

Attachment: USB drive with Modeling Demonstration Technical Support Documentation