



Office of the Governor

State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

November 1, 2016

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

RE: 2010 Primary Sulfur Dioxide (SO₂) National Ambient Air Quality Standard Area Designation Recommendation

Dear Mr. Daly:

On August 5, 2013, the EPA published a notice announcing designations of 29 areas as nonattainment for the 2010 primary SO₂ standard based on certified ambient air quality monitoring data. No portions of the State of Utah were amongst those areas designated as nonattainment. EPA, under a consent decree, is required to complete the remaining area designations by December 31, 2017, and Utah is required to submit its designation recommendation by January 13, 2017. As Governor of Utah, I hereby submit my designation recommendation that all areas of the State of Utah be designated as attainment. I make this recommendation based on the lack of sources above the Data Requirements Rule (DRR) threshold in many counties in the State, monitoring data collected within Utah's EPA-approved monitoring network, and the results of the Utah Division of Air Quality's (UDAQ) work with the federal DRR to characterize air quality in areas with large sources of SO₂.

The primary standard for SO₂ is a three-year average of the 99th percentile of the annual distribution of daily maximum one-hour average concentrations at a level of 75 ppb. The secondary standard is a three-hour standard of 50 ppb and is not to be exceeded more than once per year. The following sections provide inventory information or analytical data that demonstrate the primary standard has not been exceeded statewide.

Counties Lacking Sources Above the DRR Threshold

The following counties contain no point sources with emissions above EPA's DRR threshold of 2,000 tons/year thus resulting in a low potential to exceed the 75 ppb standard. In

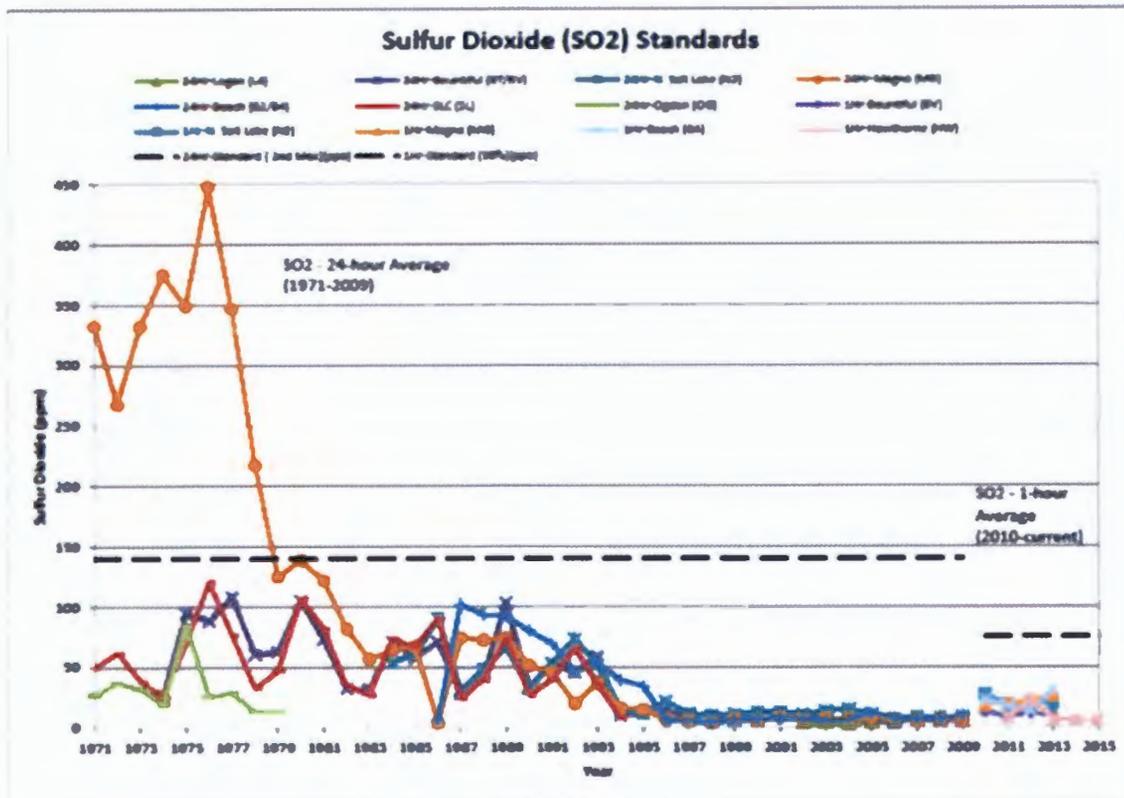
the absence of significant sources in these counties, I recommend that they be designated as attainment.

| County | 2014 SO _x Inventory (Tons) |
|------------|---------------------------------------|
| Beaver | 14.61 |
| Box Elder | 169.25 |
| Cache | 24.93 |
| Carbon | 1,092.56 |
| Daggett | 2.04 |
| Davis | 299.77 |
| Duchesne | 146.85 |
| Garfield | 3.83 |
| Grand | 23.02 |
| Iron | 27.11 |
| Juab | 17.55 |
| Kane | 12.29 |
| Morgan | 138.11 |
| Piute | 0.89 |
| Rich | 3.07 |
| San Juan | 512.89 |
| Sanpete | 13.83 |
| Sevier | 35.68 |
| Summit | 113.35 |
| Tooele | 80.48 |
| Uintah | 122.30 |
| Utah | 226.95 |
| Wasatch | 6.62 |
| Washington | 36.14 |
| Wayne | 1.87 |
| Weber | 50.04 |

Monitored Values in Salt Lake County

Throughout the 1970s, the Magna monitoring station routinely measured violations of the former 24-hour standard. Consequently, all of Salt Lake County and parts of eastern Tooele County above 5,600 feet were designated as nonattainment for SO₂. Working with EPA, UDAQ established a robust network of SO₂ monitors throughout the area. Two significant technological upgrades at the Kennecott smelter resulted in continued compliance with the SO₂ standard since 1981. In the mid-1990s, Kennecott, Geneva Steel, five refineries, and several other large sources of SO₂ made dramatic reductions in emissions as part of an effort to curb concentrations of secondary particulate (sulfates) that were contributing to PM₁₀ violations. As shown in the following graph, following the implementation of that plan, monitored concentrations of SO₂ throughout the network neared the detectability limits of the monitors, and, working with EPA, many of the SO₂ monitors were removed. Utah submitted an SO₂ Maintenance Plan and re-

designation request for Salt Lake and Tooele counties to EPA in April of 2005. Because measurements of SO₂ under the former standards and the new standard indicate that ambient air in Salt Lake County and the metropolitan area of Tooele County has been well within the federal health standards for decades, I recommend that Salt Lake County be designated as attainment.



Data Requirements Rule (DRR) for the 2010 1-Hour SO₂ Standard

On January 8, 2016, the State of Utah submitted to Region 8 a list of four point sources that, in 2014, had actual SO₂ emissions greater than the 2,000 ton/year threshold identified in the DRR.

| Source | County | 2014 SO ₂ Emissions (tons) |
|---------------------------|---------|---------------------------------------|
| Carbon Power Plant | Carbon | 9,241.4 |
| Hunter Power Plant | Emery | 3,939.3 |
| Huntington Power Plant | Emery | 2,479.2 |
| Intermountain Power Plant | Millard | 4,371.5 |

Because the Carbon Power Plant, located in Carbon County, was in the process of closing down in 2014, the total SO₂ emissions from all sources in Carbon County in 2014 dropped below 2,000 tons to 1,092.56 tons. Consequently, I included Carbon County in the list of counties

lacking sources above the 2,000 ton/year DRR threshold. The Carbon Power Plant subsequently closed in April 2015.

On May 17, 2016, UDAQ submitted its modeling analysis for the remaining three sources. UDAQ concluded that there were no viable exposure points for the three sources (see attached modeling results). UDAQ will conduct verification modeling for the next three years per the DRR requirements. I recommend that Emery and Millard counties be designated as attainment based on the DRR modeling analysis.

Should you have any questions or need further information, please contact Bryce Bird, Director of the Division of Air Quality at (801) 536-4064 or bbird@utah.gov.

Sincerely,

A handwritten signature in black ink that reads "Gary R. Herbert". The signature is written in a cursive style with a long horizontal stroke at the end.

Gary R. Herbert
Governor

Enclosure