



## 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 (SO<sub>2</sub>) 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 SO<sub>2</sub> 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 SO<sub>2</sub>.

The primary standard for SO<sub>2</sub> 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

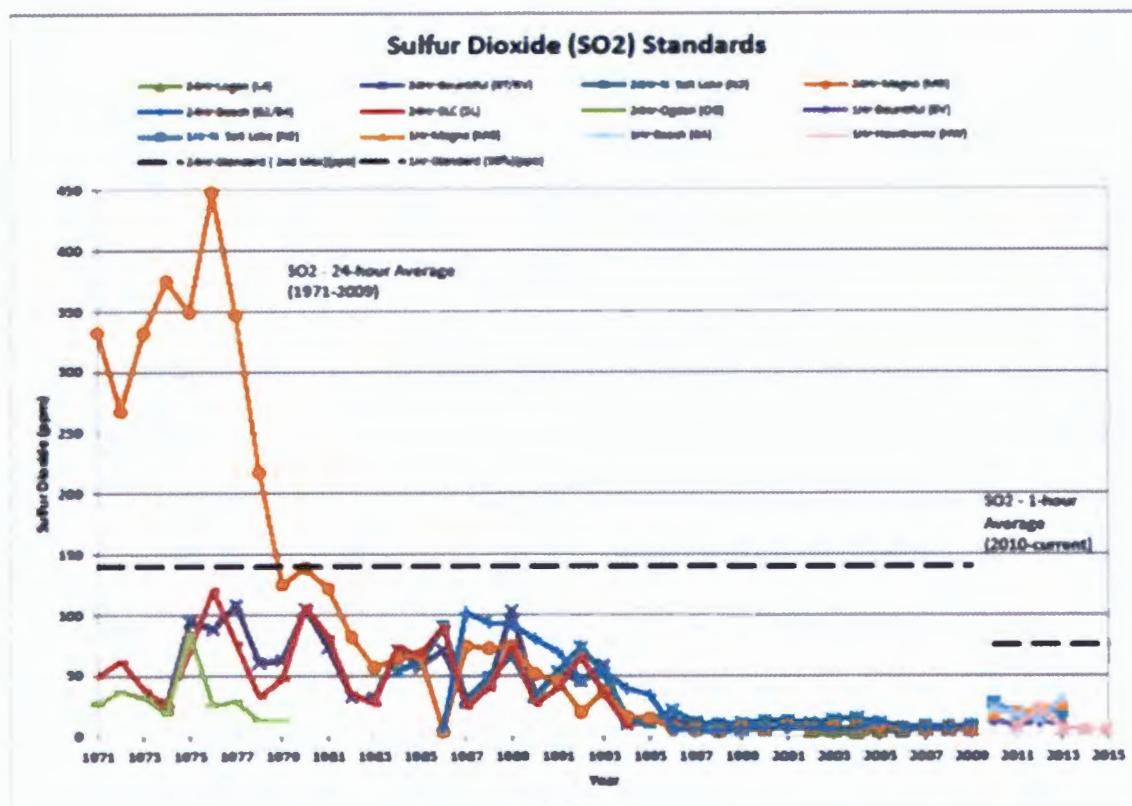
the absence of significant sources in these counties, I recommend that they be designated as attainment.

County	2014 SO <sub>x</sub> 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 SO<sub>2</sub>. Working with EPA, UDAQ established a robust network of SO<sub>2</sub> monitors throughout the area. Two significant technological upgrades at the Kennecott smelter resulted in continued compliance with the SO<sub>2</sub> standard since 1981. In the mid-1990s, Kennecott, Geneva Steel, five refineries, and several other large sources of SO<sub>2</sub> made dramatic reductions in emissions as part of an effort to curb concentrations of secondary particulate (sulfates) that were contributing to PM<sub>10</sub> violations. As shown in the following graph, following the implementation of that plan, monitored concentrations of SO<sub>2</sub> throughout the network neared the detectability limits of the monitors, and, working with EPA, many of the SO<sub>2</sub> monitors were removed. Utah submitted an SO<sub>2</sub> Maintenance Plan and re-

designation request for Salt Lake and Tooele counties to EPA in April of 2005. Because measurements of SO<sub>2</sub> 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 SO<sub>2</sub> Standard**

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

Source	County	2014 SO <sub>2</sub> 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 SO<sub>2</sub> 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](mailto:bbird@utah.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Gary R. Herbert", with a long horizontal stroke extending to the right.

Gary R. Herbert  
Governor

Enclosure