**Department of
Environmental Quality**

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQ-060-25

UTAH AIR QUALITY BOARD MEETING
June 4, 2025 – 1:30 p.m.
195 North 1950 West, Room 1015
Salt Lake City, Utah 84116
FINAL MINUTES

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I. Call-to-Order

Michelle Bujdoso called the meeting to order at 1:32 p.m.

Board members present: Michelle Bujdoso, Jeff Silvestrini, Dave Spence, Ashley Sumner (on behalf of Tim Davis), Seth Lyman (attended electronically), Colton Norman (attended electronically), Sonja Norton (attended electronically), John Rasband (attended electronically),

Excused: Kim Frost, Tim Davis

Executive Secretary: Bryce Bird

II. Date of the Next Air Quality Board Meeting: July 2, 2025, and August 6, 2025

The July 2, 2025, meeting is canceled. The next meeting is August 6, 2025, and will include the annual Board training working meeting beginning at 11:00 a.m.

III. Approval of the Minutes for the May 7, 2025, Board Meeting.

● Jeff Silvestrini motioned to approve the May 7, 2025, minutes. Dave Spence seconded. The motion carries unanimously.

IV. Propose for Final Adoption: Amend R307-150. Emission Inventories. Presented by Greg Mortensen.

Greg Mortensen, Inventory Section Manager at DAQ, stated that on February 5, 2025, the DAQ proposed changes to R307-150, Emission Inventories, for public comment. The Air Quality Board approved a 30-day comment period, extended by 15 days at the Utah Petroleum Association's request.

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Proposed amendments included: clarifying rule language on sulfur dioxide (SO_2) requirements; adding a section and definition for mobile source reporting on point source facilities; removing undocumented hazardous air pollutants (HAPs) reporting thresholds; and making clerical, reference, and formatting adjustments.

The DAQ reviewed all comments from March 1 to April 15, 2025, as per 63G-3-301(11)(b) of the Utah Administrative Rulemaking Act. All comments are on the DAQ webpage, with a detailed summary in Appendix A included in the packet.

No comments opposed SO_2 reporting changes. Mobile source emissions reporting garnered various comments, revealing confusion on applicability, process, and necessity. Comments suggested guidance and outreach would be preferred/sufficient. The DAQ agrees to remove the mobile emissions reporting proposal to allow for guidance development and outreach.

Regarding HAPs, comments noted other states have thresholds, while Utah's seemed arbitrary. Some preferred mirroring other states' thresholds or continuing with the current rule. Concerns about regulatory uncertainty and the impact on reporting templates were raised.

At least two states (West Virginia and Oklahoma) have no HAPs reporting threshold. States with thresholds noted they were based on Title V HAPs permitting thresholds or decades-old, arbitrary figures that don't account for varying HAP impacts or future scientific changes.

The DAQ's historic method likely attempted to account for varying HAP impacts, using individual thresholds weighted by American Conference of Governmental Industrial Hygienists factors. However, this calculation is complex, and the DAQ was unable to review the factors when asked. Continuing with an undocumented method that cannot be replicated with questionable factors is also arbitrary.

Removing threshold requirements allows the DAQ to acknowledge varying HAP impacts without setting arbitrary limits. For most facilities, especially smaller ones, the State and Local Emissions Inventory System (SLEIS) autopopulation feature saves time by identifying required pollutants.

Sources will experience reduced regulatory uncertainty as they won't need to calculate individual HAP thresholds, estimate emissions, and verify they are below the threshold. SLEIS calculates HAPs emissions, easing the regulatory burden. This process aligns with SLEIS, R307-150 certification language, and EPA's definition of an emissions inventory.

Furthermore, setting no threshold aligns with the DAQ's notice of intent (NOI) permitting requirements (UAC R307-410-5(1)(c)), which require examination of all increases, meaning all HAPs above zero should be included in the NOI.

Template uploads into SLEIS are unaffected by upgrades; sources successfully used them after the autopopulation feature was added in 2024.

Finally, the DAQ incorporated clerical adjustments to rule references suggested in comments and made additional changes to comply with Executive Order 2021-12, identified by the Utah Office of Administrative Rules. Staff recommends the Board approve the proposed amendments to rule R307-150, Emission Inventories, for final adoption.

Several Board members voiced appreciation to division staff on their work with industry to get to a final workable rule, especially the mobile source and SO_X portions.

Mr. Rasband comments that SLEIS is one of several emissions reporting tool. It is not super user friendly based on his experience. As division staff work with SLEIS developers, he would encourage continued upgrades and improvements to the software as it can be a difficult software to work with currently.

Mr. Mortensen stated that sources would be required to report HAP emissions with zero thresholds by April 15, 2026, in response to Ms. Bujdoso's inquiry about the initial reporting year.

Ms. Bujdoso cautions that when staff consider future changes to rules that are going to have an effective date, staff consider a phase in period for how sources would be able to implement the rule.

Dr. Lyman comments that he understands that the topic of onsite mobile source emissions is being deferred. Have these emissions been excluded from previous inventories, or is there an alternative estimation method currently in use? Mr. Mortensen responded that there are several point sources who already report those mobile sources on their point source facilities, approximately 52% of sources. Currently it is not a requirement. This is something that DAQ needs to address and something that could be done by guidance.

- Jeff Silvestrini motioned for final adoption of amendment to R307-150, Emission Inventories. John Rasband seconded. The motion carries unanimously.

V.   Informational Items.

A. Air Toxics. Presented by Leonard Wright.

B. Compliance. Presented by Harold Burge, Rik Ombach, and Chad Gilgen.

C. Monitoring. Presented by Thomas Greene.

Thomas Greene, Environmental Scientist at DAQ, updated the Board on monitoring information.

D. Other Items to be Brought Before the Board.

E. Board Meeting Follow-up Items.

- This agenda section is dedicated to addressing any questions Board members may have, or topics they'd like to see presented at future meetings. Board members are asked to reach out to Bryce Bird or division staff with inquiries or requests.

- Board members can and do serve on other committees. Mayor Silvestrini represents the Board on the Wasatch Front Regional Council's (WFRC) Transportation Coordinating Committee (Trans Com), which allocates state and federal road funding to local jurisdictions. Kim Frost represents the Board on WFRC's Regional Growth Committee, the policy advisory body for long-range transportation planning and growth. Board members should think about serving on these committees either as alternates or committee members when openings are available.

- There is a separate planning organization in Utah county, the Mountainland Association of Governments (MAG), in which division staff provide input at the MAG regional council and technical meetings.

Meeting adjourned at 1:57 p.m.
Minutes approved: August 6, 2025