



State of Utah

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Environmental Quality

Alan Matheson  
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DIVISION OF AIR QUALITY  
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Cassady Kristensen  
Randal S. Martin  
Alan Matheson  
Arnold W. Reitze Jr.  
William C. Stringer  
Bryce C. Bird,  
*Executive Secretary*

**UTAH AIR QUALITY BOARD MEETING**

**December 6, 2017 – 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**

Michael Smith called the meeting to order at 1:30 p.m.

Board members present: Michael Smith, Erin Mendenhall, Kevin Cromar, Mitra Kashanchi, Cassady Kristensen, Randal Martin, Alan Matheson, Arnold Reitze, William Stringer

Executive Secretary: Bryce Bird

Mitra Kashanchi was introduced as a new Board member who replaces Karma Thomson. Ms. Kashanchi represents the fuels industry as Chevron's Utah refinery manager.

**II. Date of the Next Air Quality Board Meeting: January 3, 2018**

**III. Approval of the Minutes for October 4, 2017, Board Meeting.**

A correction was made on page 7 where it has marginal attainment. It should actually be marginal nonattainment.

- Arnold Reitze moved to approve the minutes as corrected. Erin Mendenhall seconded. The Board approved unanimously.

**IV. Final Adoption: Amend R307-403. Permits: New and Modified Sources in Nonattainment Areas and Maintenance Areas. Presented by Mat Carlile.**

Mat Carlile, Environmental Planning Consultant at DAQ, stated that EPA entered into a consent decree on June 2, 2016, which required them to approve, disapprove, or conditionally approve certain state implementation plan (SIP) submissions from states to address specific requirements for the 2006 PM<sub>2.5</sub> national ambient air quality standards (NAAQS). R307-403 was one of these submissions. EPA determined that there were potential deficiencies in R307-403. In response to EPA, the DAQ sent a letter to EPA committing to revise portions of R307-403 no later than December 8, 2017. The amendments today fulfill those commitments. On September 6, 2017, the

Board proposed amendments to R307-403. A public comment period was held from October 1 to October 31, 2017. No comments were received and no hearing was requested. However, comments made at the September 6, 2017, Board meeting did not get incorporated into the document that was released for public comment. The suggested changes were not substantive and have been incorporated into the proposed rule for adoption. Staff recommends that the Board adopt R307-403 as amended.

Mr. Martin stated that there is a problem where it states in R307-403-1(c) that ammonia is listed as not being a precursor to PM<sub>2.5</sub> in the Logan, Salt Lake, and Provo nonattainment areas when scientific research shows that language is not defensible in those air sheds. There was also discussion about the possibility of a change in language and what are the administrative impacts of making any changes at this point.

Staff explained that this rulemaking action is part of the consent decree that EPA entered into to satisfy several moderate area SIP obligations from Utah and other states. SIPs have different elements, one of which is the nonattainment new source review (NNSR) requirements. Utah has submitted the SIPs for these areas and since then a new PM implementation rule came out which requires a precursor analysis as pertaining to NNSR. DAQ is trying to supplement each of the moderate area SIPs with the analysis so that EPA can ultimately take action. The Logan analysis is complete and concludes that the area is rich in ammonia and therefore it is appropriate to exempt ammonia as a precursor. DAQ worked out with EPA over the last year to satisfy EPA's consent agreement and DAQ has committed to revising its NNSR rules by the end of this week as per EPA's suggested corrections. Initially, there was language in a draft amendment of the rule stating that upon a demonstration ammonia would not be a precursor. EPA found this objectionable. The rules today include language for not just the Logan area, which is supported by the demonstration, but also the other two areas with the understanding that these will be revisited in the work for the serious area SIPs for the Salt Lake and Provo areas. From an administrative standpoint, if changes were made to the language as suggested today staff would not have time to fix other inconsistencies in the rule because the modeling has not been done for the Salt Lake and Provo areas. Staff indicates there are two options before the Board. The Board could go forward with the rule as is with the understanding that the rule will be revisited at a later date which would address the issue of ammonia as a precursor; or the Board could table the rule and allow it to lapse and again deal with it at a later date.

Staff also responded to the question asking if there are any sources of ammonia in these areas based on the emissions inventory. There are two sources in the Salt Lake area, one source in Utah County, and no sources in Logan for sources over 70 tons per year. Staff also explained that in R307-403-5(2) where it reads that "for the offset determinations, PM<sub>10</sub>, sulfur dioxide, and oxides of nitrogen shall be considered on an equal basis" is specific to the PM<sub>10</sub> nonattainment areas and those pollutants are looked at on a one-for-one ratio. In R307-403-5(4)(e), where it states that offsets may not be traded between pollutants, is for PM<sub>2.5</sub> nonattainment areas which is specific to major source permitting.

- Kevin Cromar moved that the Board allow R307-403 to lapse and not submit for final adoption. Randal Martin seconded. The Board approved the motion with seven in favor (E. Mendenhall, K. Cromar, M. Kashanchi, C. Kristensen, R. Martin, A. Reitze, W. Stringer) and one against (M. Smith).

**V. Propose for Public Comment: Amend R307-350. Miscellaneous Metal Parts and Products Coatings; R307-353. Plastic Parts Coatings; and R307-355. Aerospace Manufacture and Rework Facilities. Presented by Mat Carlile.**

Mat Carlile, Environmental Planning Consultant at DAQ, stated that on October 4, 2017, the Board directed staff to bring back proposed amendments to R307-350, R307-353, and R307-355. Some Board members expressed concerns with the full exemption granted to medical devices up to 800 pounds of volatile organic compound (VOC) per year granted in both R307-350 and R307-353 and asked for language that would add conditions to the exemption. In addition, during the meeting the Board received a request to add an exemption to R307-355 for the cleaning of laser hardware, scientific instruments, and high precision optics. The Board also asked staff to bring back proposed language to include the exemption in R307-355. Staff reviewed the Board's requests and is proposing the amendments. Staff recommended that the Board propose for public comment these rules as amended.

- Arnold Reitze moved to propose R307-350, R307-353, and R307-355 for public comment as amended. Erin Mendenhall seconded. The Board approved unanimously.

Thomas Gunter was introduced as DAQ's new rules coordinator.

**VI. Informational Items.**

**A. PM2.5 State Implementation Plan Update. Presented by Bill Reiss.**

Bill Reiss, Environmental Engineer at DAQ, stated that in September 2017 staff informed the Board that we are no longer on track to meet the deadlines for the serious area SIPs. Much of the technical work has been compiled for each SIP which includes: a validated air quality model; a base year emissions inventory; draft emissions inventories for all the other years that could potentially be utilized in the SIPs; and work is still being done on the best available control technology (BACT) analyses for stationary sources. Staff are still determining whether attainment can be demonstrated in 2019, which is the year containing our statutory attainment date. If attainment can be demonstrated in 2019, the SIPs would be relatively simple to piece together. If not, additional work and time will be needed. Even though the BACT work is not complete, staff went back through the inventories on a case-by-case basis. That model showed more reductions in emissions from the vehicle emission program but those results also showed we would still be over the standard at Rose Park and Hawthorne in 2024. The Provo area showed values below the standard.

Since the difficulties are mostly confined to Rose Park and Hawthorne, DAQ is going to separate the two nonattainment areas of Salt Lake and Provo where Provo will be put on a faster track. There are only two stationary sources in the Provo area and the BACT work is almost complete on those sources, which means the projection emissions inventory for Provo can be completed and the 2019 model is being run right now. The results for Provo are expected to show attainment in 2019. However, this all depends on the starting point. EPA's modeling guidance allows some flexibility in selecting the starting point for the monitored design value. Staff plans to finish the final internal audit for the Provo reports and plan to have them posted for public review at the end of January 2018.

For now, the moderate SIP for the Logan area should be sufficient as long as EPA does not reclassify the area. The Provo and Salt Lake SIPs are due at the end of 2017, and DAQ will not be able to meet this deadline. For the Provo nonattainment area, if we can show

attainment in 2019 that SIP could be completed at the end of the first quarter in 2018, but again it depends on the starting point.

It was commented that research by the Kem Gardner Policy Institute shows the greatest population growth along the Wasatch Front is going to be in Utah County, in particular west of Utah Lake and how is DAQ predicting population growth in its models. Staff responded that DAQ is applying the REMI modeling approach to stationary sources and results show that area sources represent a fair piece of the VOC and NOx emissions.

**B. Air Toxics. Presented by Robert Ford.**

**C. Compliance. Presented by Jay Morris and Harold Burge.**

**D. Monitoring. Presented by Bo Call.**

Bo Call, Monitoring Section Manager at DAQ, updated the Board on monitoring information noting a current inversion is setting up along the Wasatch Front and Cache Valley and is forecasted to last a couple of weeks.

**E. Other Items to be Brought Before the Board.**

Mr. Martin stated that the second Science for Solutions, a Utah air quality research conference, will be held the end of March or first of April at Weber State University. More information will be sent to the Board as it becomes available. Also, Mr. Martin and Joe Thomas of DAQ were involved with research about vehicle cold starts and idling studies. As a result some informational posters were developed and distributed throughout the Cache Valley.

**F. Board Meeting Follow-up Items.**

- R307-403 will lapse as a result of today's decision. Staff will bring back a revised R307-403 at a future meeting when the ammonia precursor analysis has been completed.

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Meeting adjourned at 2:30 p.m.

Minutes approved: January 3, 2018