



State of Utah

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Department of
Environmental Quality

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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

March 7, 2018 – 1:30 p.m.
195 North 1950 West, Room 1015
Salt Lake City, Utah 84116
FINAL MINUTES

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, Alan Matheson, and Arnold Reitze

Excused: Randal Martin and William Stringer

Executive Secretary: Bryce Bird

II. Date of the Next Air Quality Board Meeting: May 2, 2018

The April 2018 is meeting canceled. The next Board meeting will be on May 2, 2018.

III. Approval of the Minutes for January 3, 2018, Board Meeting.

- Arnold Reitze moved to approve the minutes. Cassady Kristensen seconded. The Board approved unanimously.

IV. Final Action: Amend R307-350. Miscellaneous Metal Parts and Products Coatings; and R307-353. Plastic Parts Coatings. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that on December 6, 2017, the Board proposed for public comment certain conditions to the 800 pounds of coating exemptions for medical device manufacturers in these rules. A 30-day public comment period was held from January 1 to 31, 2018. BD Medical, the only company affected by the proposed rule change, was the sole commenter. Staff reviewed the comments and recognizes that the rule amendment may constitute most stringent measures when best available control measures would be required under a serious state implementation plan (SIP). Given the information provided by BD Medical and the complexities involved in this case, staff recommends the Board let the rule lapse without approval.

- Erin Mendenhall moved that the Board take no action on R307-350 and R307-353. Arnold Reitze seconded. The Board approved unanimously.

V. Final Adoption: Amend R307-355. Aerospace Manufacture and Rework Facilities. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that on December 6, 2017, the Board proposed for public comment an amendment to exempt solvent cleaning of laser hardware, scientific instruments, and high precision optics. A 30-day public comment period was held from January 1 to 31, 2018. The Boeing Company provided the sole comment in support of the proposal. Staff recommends that the Board adopt R307-355 as proposed.

- Arnold Reitze moved that the Board adopt R307-355, Aerospace Manufacture and Rework Facilities. Kevin Cromar seconded. The Board approved unanimously.

VI. Propose for Public Comment: Revision to Carbon Monoxide Maintenance Plan Provo Area. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that staff proposed revisions to the Provo Area carbon monoxide (CO) attainment maintenance plan to show continued attainment of the CO national ambient air quality standard (NAAQS) for a second 10-year term as required by the Clean Air Act; and to adopt an alternative CO monitoring method that does not utilize the traditional gaseous analyzer to determine compliance with the NAAQS. The alternative monitoring method will utilize the annual review of the traffic volume near the current North Provo monitoring station. The contingency plan includes reinstating traditional gaseous monitoring in the event that the traffic volume substantially increases in forthcoming years. Staff recommends that the Board propose the revisions to the Carbon Monoxide Maintenance Plan Provo Area for a 30-day public comment period.

Staff addressed several questions and comments from the Board. In regards that if traffic increases in this area and DAQ goes back to a monitor and then goes back to traffic count, would there be a new baseline on traffic count? Staff responded that there is a possibility the baseline may have to change if the rolling 3-year average daily traffic (ADT) value is 25% higher than the average value from the 2013-2016 baseline period. But if it remains below 50% of the CO NAAQS stated in the plan then the baseline can just be realigned.

To explain the purpose of the request to stop monitoring through the traditional gaseous analyzer and the timing as related to Tier 3 fuels, staff responded that in addition to the purposes listed in the plan; this monitor is costly and unnecessary. EPA recognizes that it is extremely unlikely that we would ever exceed the standard at this location and has agreed to decommission the North Provo monitoring station. In addition, the CO monitor has already been moved to the Lindon monitoring station. The cost savings is due to one less monitoring station that will require weekly maintenance and that operating costs of the building will no longer be required. As far as timing, because CO levels started to decline in 2001 and the levels have been stable since that period, DAQ and EPA agree that it is unlikely that there will be an exceedance of CO at this location and so it makes sense to decommission this station without waiting for Tier 3 fuel.

In regards to the measured period for the 3-year rolling average, it is measured during the same four month period from November through February because the CO level is highest during that period. In addition, the I/M program in Utah County for the CO maintenance plan was an option as a contingency measure in the SIP. It currently remains a contingency measure as it was included in the original SIP. The criteria to request attainment status for CO is that we need two 10-year planning periods showing attainment and then we can request reclassification at that point.

Finally, the reference in the plan "...vehicles that were manufactured in 1995 or later" will be corrected to read "...vehicles that were manufactured in 1995 or earlier" as part of the public comment process.

Public comment from Susan Hardy of Mountainland Association was introduced. Ms. Hardy stated that this CO maintenance plan relates to Provo City and that CO is a localized emission and not county-wide. She expressed concern with staff's use of the word 'substantial' which she believes is open to interpretation. In addition, that it should be the emission increase not traffic that may or may not mean the reason for any other action. CO is a pollutant that needs to be eliminated from the books and it is her impression that EPA also feels that it should be eliminated from its books.

- Kevin Cromar moved to propose the revision to Carbon Monoxide Maintenance Plan Provo Area for public comment. Cassidy Kristensen seconded. The Board approved unanimously.

VII. Propose for Public Comment: Amend R307-110-12. Section IX, Control Measures for Area and Point Sources, Part C, Carbon Monoxide. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that the amendment to Section IX, Control Measures for Area and Point Sources, Part C, Carbon Monoxide, will have to be incorporated into the Utah Air Quality rules. R307-110-12 is the rule that incorporates the new Carbon Monoxide Maintenance Plan. If the Board adopts the amendments proposed to Part C, these amendments will become part of the Utah SIP when the rule is finalized. Staff recommends that the Board propose the amended R307-110-12 for a 30-day public comment period.

- Erin Mendenhall moved to propose R307-110-12 for public comment. Arnold Reitze seconded. The Board approved unanimously.

VIII. Propose for Public Comment: Amend R307-403. Permits: New and Modified Sources in Nonattainment Areas and Maintenance Areas. Presented by Bill Reiss.

Bill Reiss, Environmental Scientist at DAQ, stated that R307-403 was presented to the Board last fall. At that time, the Board raised some objections concerning the exemption of ammonia as a precursor and that in two of the three nonattainment areas the underlying technical analysis was not completed. The proposed rule at that time had treated them all the same way and had exempted ammonia in each of those areas as per the old implementation rule when the rule was written. Today's proposed rule still addresses EPA's issues concerning their consent decree, but now separates all three nonattainment areas with respect to the way that ammonia is handled for purposes of nonattainment new source review. Staff recommends that the Board propose the amendments to R307-403 for a 30-day public comment period.

Staff addressed questions and comments from the Board and it was agreed that those would be better addressed as comments for the public comment period. In regards to the PM₁₀ nonattainment area and the offsetting rule for PM₁₀, how would DAQ apply the statement, "Sources or modifications determined to be major for any of these precursors shall, for offsetting requirements, also be regarded as major for that pollutant for which the area is designated nonattainment" for PM₁₀ offsets; how would a project be reviewed under PM₁₀ and PM_{2.5} if it goes major for precursors? This will be addressed during the public comment period.

Should this rule be written the same as the federal rule where it specifically addresses individual PM_{2.5} precursor? As an example, in the rule where it states, “70 tons per year of any individual precursor for PM_{2.5}, in any serious nonattainment area for PM_{2.5}.” Staff agrees that it should be changed to read the same as the federal rule and it will be addressed as part of the public comment period.

In regards to offsets for sources outside of the nonattainment area, are offsets only required if impact is primary PM_{2.5}, or is it any PM_{2.5} whether it’s primary or secondary before an offset is required? Staff responded that since modeling would be necessary in such a case, it is correct to specify only direct PM_{2.5} because these precursors react to become particulate in a way that is difficult to model within the context of a new source review action. A more explicit response will be prepared as part of the public comment process.

The original motion was amended regarding the issue of individual PM_{2.5} precursor as stated in federal rule. Staff will make the change to the rule before it goes out for comment by inserting “individual” in several places in the rule so that it written the same as the federal rule where it should read individual PM_{2.5} precursor.

- Arnold Reitze moved that the Board propose R307-403, Permits, New and Modified Sources in Nonattainment Areas and Maintenance Areas, for public comment and to insert “individual” where necessary in the rule as amended. Erin Mendenhall seconded. The Board approved unanimously.

IX. Propose for Public Comment: Amend R307-101-2. Definitions. Presented by Bill Reiss.

Bill Reiss, Environmental Engineer at DAQ, stated that this rule has been amended to update the definition of “PM_{2.5} Precursor,” adding ammonia to the list of scientific PM_{2.5} precursors, and accommodating provision in the federal PM implementation rule. In the new implementation rule, the PM_{2.5} precursors are all treated the same, except where a state’s demonstration proves otherwise. This proposal amends our definition to treat all precursors in this way and also exempts ammonia for the Logan area as determined in the technical demonstration submitted to EPA. Staff recommends that the Board approve R307-101-2 for a 30-day public comment period.

- Erin Mendenhall moved that the Board propose R307-101-2, Definitions, for public comment. Arnold Reitze seconded. The Board approved unanimously.

X. Propose for Continuation: Five-Year Reviews of R307-102, General Requirements: Broadly Applicable Requirements; R307-107, General Requirements: Breakdowns; R307-115, General Conformity; R307-123, General Requirements: Clean Fuels and Vehicle Technology Grant and Loan Program; R307-170, Continuous Emission Monitoring Program; R307-208, Outdoor Wood Boilers; R307-220, Emission Standards: Plan for Designated Facilities; R307-221, Emission Standards: Emission Controls for Existing Municipal Solid Waste Landfills; R307-222, Emission Standards: Existing Incinerators for Hospital, Medical, Infectious Waste; R307-223, Emission Standards: Existing Small Municipal Waste Combustion Units; R307-224, Mercury Emission Standards: Coal-Fired Electric Generating Units; R307-250, Western Backstop Sulfur Dioxide Trading Program; R307-303, Commercial Cooking; R307-312, Aggregate Processing Operations for PM_{2.5} Nonattainment Areas; R307-342, Adhesive and Sealants; R307-344, Paper, Film, and Foil Coatings; R307-345, Fabric and Vinyl Coatings; R307-346, Metal Furniture Surface Coatings; R307-347, Large Appliance Surface Coatings; R307-348, Magnet Wire Coatings; R307-349, Flat Wood Panel Coatings; R307-350, Miscellaneous Metal Parts and Products Coatings; R307-351, Graphic Arts; R307-352, Metal

Container, Closure, and Coil Coatings; R307-353, Plastic Parts Coatings; R307-354, Automotive Refinishing Coatings; R307-355, Control of Emissions from Aerospace Manufacture and Rework Facilities; R307-356, Appliance Pilot Light; R307-357, Consumer Products; and R307-801, Asbestos. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that Utah Code 63G-3-305 requires each agency to review and justify each of its rules within five years of a rule's original effective date or within five years of the filing of the last five-year review. This review process is not a time to revise or amend the rules, but only to verify that the rule is still necessary and allowed under state and federal law. As part of this process, DAQ is required to identify any comments received since the last five-year review of each rule. Staff has reviewed all rules listed in agenda Item 10 and has determined that they should be continued. Staff recommends that the Board continue all listed rules by approving the attached forms to be filed with the Office of Administrative Rules.

- Cassady Kristensen moved that the Board approve the filing of the forms for the rules as listed in agenda item 10. Mitra Kashanchi seconded. The Board approved unanimously.

XI. Informational Items.

A. Air Toxics. Presented by Robert Ford.

B. Compliance. Presented by Jay Morris and Harold Burge.

C. Monitoring. Presented by Bo Call.

Bo Call, Monitoring Section Manager at DAQ, gave an update on the monitoring data and answered several questions. Mr. Call indicated that staff also noticed the December PM_{2.5} data spikes at Hawthorne and Rose Park and staff is reviewing the data for a possible cause. These spikes usually happen during inversions when the air flow is generally stagnant. As requested to help see the days prior to an inversion build-up, staff will come up with a notation for the monitoring charts indicating the inversion dates. In addition, there are times, such as for an exceptional event, when staff can do analysis on the filter components on the filters as needed.

In response to the inquiry if there was an environmental justice specialists on staff, Mr. Matheson replied that DEQ does not and that in regards to monitoring, DAQ does recognize that some monitors consistently show higher levels. As plans and strategies are developed, DEQ strives to make sure that its limited resources are put to work targeting areas where it will do the most good.

D. Other Items to be Brought Before the Board.

The Utah winter fine particulate study is being finalized and results should be ready in April or May 2018.

E. Board Meeting Follow-up Items.

Meeting adjourned at 2:23 p.m.

Minutes approved: May 2, 2018