



State of Utah

Department of  
Environmental Quality

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October 27, 2004

Steve Tuber  
U.S. EPA Region VIII  
999 18th Street, Suite 500  
Denver, CO 80202

Dear *Steve* Mr. Tuber:

Thank you for meeting with us today to discuss Utah's PM2.5 designation request. We feel there was an excellent exchange of information that should help correct some of the misunderstanding on both our parts concerning our request and the EPA designation process. We would like to summarize the substance of what we jointly clarified today.

First, Utah does not propose to use single townships as a nonattainment area or a PSD air quality impact/baseline area. We understand that such a proposal would not be approved by EPA. Townships are to be used as the "currency" for defining the boundaries of larger non-attainment or PSD analysis areas, not the areas themselves.

Second, Utah recommended Attainment Area designations in Attachment 1 of our February 13, 2004 submittal from Governor Walker that are acceptable to EPA. These were for Box Elder, Cache, Davis, Salt Lake, Tooele, Utah, and Weber counties. The township-boundary setting process for these areas is illustrated in Attachments 1 and 2 the February 13, 2004 submittal. These boundaries were derived using the criteria in Jeff Holmsteaad's April 1, 2003 memo on designations for the PM2.5 NAAQS (Section 4 of Atch 2).

Third, EPA understood DEQ's February submittal to indicate that the default attainment/unclassifiable and PSD area boundaries would be by county for the remainder of the State. While this was not our original intent, we can agree that counties would be an initial system of boundaries that could be amended in the future using a collection of townships to refine boundaries based on the EPA designation criteria, PSD rules and a more detailed township-boundary setting process to be developed.

Again, we appreciate your effort in promoting our mutual understanding of an effective and protective system for PM2.5. We look forward to working with you to incorporate this in the PM2.5 designation for the State of Utah.

Best regards,

Dianne R. Nielson, Ph.D.  
Executive Director

cc: **Richard Long**, EPA  
Rick Sprott, DEQ

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