December 10, 2013

Shaun McGrath, Regional Administrator  
U.S. Environmental Protection Agency, Region 8  
1595 Wynkoop Street  
Denver, Colorado 80202-1129

Dear Mr. McGrath:

Re: Utah Area Designation Recommendations for the 2012 PM$_{2.5}$ NAAQS

The purpose of this letter is to recommend appropriate PM$_{2.5}$ area designations for all areas of the State of Utah. These recommendations are made in response to EPA’s December 14, 2012, revision to the National Ambient Air Quality Standard (NAAQS) for PM$_{2.5}$. Section 107(d) of the Clean Air Act (the Act) directs states to provide their recommendations to EPA following promulgation of new or revised NAAQS.

EPA’s 2012 NAAQS revision lowered the annual PM$_{2.5}$ standard from 15 µg/m$^3$ to 12 µg/m$^3$, and retained the 24-hour standard at 35 µg/m$^3$. Utah has monitored PM$_{2.5}$ since 2000 and has never identified any area within the state that violated the annual standard, even at 12 µg/m$^3$.

Data collected by Utah’s PM$_{2.5}$ monitoring network shows all areas comply with this new standard$^1$. Hence, I am not recommending at this time any new areas within the state that should be designated as “Nonattainment” for PM$_{2.5}$.

There are presently three distinct areas in Utah that have been designated nonattainment for PM$_{2.5}$. The following areas are identified and described in 40 CFR 81.345: the Logan, Utah-Idaho, PM$_{2.5}$ nonattainment area; the Provo, Utah, PM$_{2.5}$ nonattainment area; and the Salt Lake City, Utah, PM$_{2.5}$ nonattainment area. Each was designated nonattainment for the 2006 24-hour NAAQS.

The boundary for each of these areas was defined, in consultation with EPA, based on a rigorous analysis of nine factors. EPA’s latest guidance on PM$_{2.5}$ area designations$^2$ identifies

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$^1$ EPA has directed States to make their area designation recommendations based on ambient air data collected for calendar years 2010–2012. This data has been quality assured and sent to EPA, and is available in EPA’s AQS data system.

$^2$ "Initial Area Designations for the 2012 Revised Primary Annual Fine Particulate National Ambient Air Quality Standard", April 16, 2013.
five factors to be considered in defining nonattainment area boundaries and notes that they are comparable to the factors that states have successfully used in making area designations for the 1997 and 2006 PM$_{2.5}$ NAAQS. These include air quality data, emissions and emissions related data, meteorology, geography/topography, and jurisdictional boundaries.

My recommendation is that each of these existing nonattainment areas should specifically be designated as “Attainment/Unclassifiable” with respect to the 2012 annual NAAQS for PM$_{2.5}$.

All other areas of the state not identified as areas of nonattainment should also be designated as “Attainment/Unclassifiable.” The one exception to this recommendation concerns all Tribal Lands, over which Utah Division of Air Quality has no jurisdiction in such matters. It will be left to the EPA and the Tribes to designate these areas as they see fit.

The submittal of any further documentation, which EPA determines is necessary to verify or otherwise meet the requirements of section 107 (d) of the Act, will be submitted by Bryce Bird, Director of the Division of Air Quality, and any questions your agency may have concerning this submittal should be addressed to Mr. Bird at (801)536-4064.

Sincerely,

Gary R. Herbert
Governor