



# STATE OF UTAH

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February 13, 2004

Robbie E. Roberts, Regional Administrator  
U.S. Environmental Protection Agency, Region VIII  
999 18<sup>th</sup> Street, Suite 300  
Denver, CO 80202-2466

Dear Mr. Roberts:

Re: Initial Recommendation Concerning Area Designations for Particulate Matter with an Aerodynamic Diameter of 2.5 Micrometers or Less (PM<sub>2.5</sub>)

The purpose of this letter is to recommend specific initial PM<sub>2.5</sub> designations for areas within the state of Utah.

On July 18, 1997, the EPA established new National Ambient Air Quality Standards (NAAQS) for PM<sub>2.5</sub>. Section 107(d) of the Clean Air Act (the Act) establishes that it is incumbent upon each of the states to recommend initial designations of attainment, nonattainment, or unclassified for all areas within its respective geographic boundary following promulgation of new or revised NAAQS.

Furthermore, it is required that these recommendations be made by such date as the Administrator may reasonably require. For PM<sub>2.5</sub>, it became necessary to collect at least three calendar years of air quality data before any meaningful recommendations could be made. EPA has requested recommendations from states, concerning initial area designations, by February 15, 2004. These recommendations are to be based upon data collected from 2000-2002.

Area designations are expected to be finalized by December 15, 2004. By that time, the data collected in 2003 will have been quality assured and submitted to EPA. As such, the final area designations will be based on data collected from 2001-2003.

The Utah Division of Air Quality (DAQ) has collected a sufficient three-year data set at 14 federal reference method PM<sub>2.5</sub> monitors. Each of these monitors shows compliance with both the annual and the 24-hr. standard for PM<sub>2.5</sub>.

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Therefore, there are no areas within the State which should be designated as nonattainment for PM<sub>2.5</sub>, and the areas surrounding these monitors should be designated as attainment.

All other areas of the State, for which no monitored data or insufficient data has been collected, should be listed as unclassifiable.

The attached document provides the basis for this recommendation. The submittal of any further documentation which EPA determines is necessary to verify or otherwise meet the requirements of sections 110 (a) (1) or 172 of the Act, will be submitted by Richard Sprott, Director, Division of Air Quality. Any questions your agency may have concerning this submittal should be addressed to Mr. Sprott at (801)536-0072.

Sincerely,



Olene S. Walker  
Governor

Attachment

OSW:DRN:dco

**STATE OF UTAH**  
**JUSTIFICATION FOR INITIAL RECOMMENDATION CONCERNING AREA**  
**DESIGNATIONS FOR PARTICULATE MATTER WITH AN AERODYNAMIC**  
**DIAMETER OF 2.5 MICROMETERS OR LESS (PM<sub>2.5</sub>)**

**Background**

On July 18, 1997, the EPA established new National Ambient Air Quality Standards (NAAQS) for PM<sub>2.5</sub>. Section 107(d) of the Clean Air Act (the Act) establishes that it is incumbent on each of the states to recommend initial designations for all areas within its respective geographic boundary following promulgation of new or revised NAAQS. The Act allows that areas may be designated as:

- (i) nonattainment, for any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant;
- (ii) attainment, for any area (other than an area identified in clause (i)) that meets the national primary or secondary ambient air quality standard for the pollutant; or
- (iii) unclassifiable, for any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant.

Furthermore, it is required that these recommendations be made by such date as the Administrator may reasonably require. For PM<sub>2.5</sub>, it became necessary to collect at least three calendar years of air quality data before any meaningful recommendations could be made. EPA has requested recommendations from states, concerning initial area designations, by February 15, 2004. These recommendations are to be based upon data collected from 2000–2002.

Area designations are expected to be finalized by December 15, 2004. By that time, the data collected in 2003 will have been quality assured and submitted to EPA. As such, the final area designations will be based on data collected from 2001-2003.

The Utah Division of Air Quality (DAQ) has collected a sufficient three-year data set at 14 federal reference method PM<sub>2.5</sub> monitors. Each of these monitors shows compliance with both the annual and the 24-hr. standard for PM<sub>2.5</sub>. This recommendation is based on monitoring data collected for the years 2000 through 2002 and entered into the Aerometric Information Retrieval System administered by the EPA.

**Recommendation**

There are no areas within the state, which should be designated as nonattainment for PM<sub>2.5</sub>, and the areas surrounding these monitors should be designated as attainment.

All other areas of the state, for which no monitored data or insufficient data has been collected, should be listed as unclassifiable.

Utah's initial recommendation for PM<sub>2.5</sub> area designations within the state is presented herein as Attachment 1.

Based on EPA's April 1, 2003, memorandum from Jeffrey R. Holmstead to all regional administrators, the presumptive area boundaries for any nonattainment areas recommended by the states should be defined as the Metropolitan Statistical Areas (MSAs)<sup>1</sup> in urban regions, and county boundaries in the rural areas of the states.

Although Utah's initial recommendation includes no nonattainment areas, the state is nevertheless concerned that such sweeping generalizations may not be in the best interest of our air management program. While these presumptive boundaries may make sense on a national level, wherein most of the PM<sub>2.5</sub> nonattainment areas are located in the smaller eastern states, Utah is a large western state with numerous topographical features that affect air movement in ways not seen in the eastern part of the country. In addition, several of Utah's MSAs are larger than some of the eastern states, but contain only isolated areas of concentrated population.

Attachment 2 of EPA's April 1, 2003, memorandum acknowledges that there will be instances where states may wish to depart from EPA's presumption of area boundaries, and lists the criteria by which such recommended departure will be evaluated. Included in this list of criteria are: emissions, the degree of urbanization, expected growth, topography, and meteorology.

Another point of consideration speaks to the question of whether PM<sub>2.5</sub> will be specifically addressed by the Prevention of Significant Deterioration (PSD) program. Thus far, EPA has not given any indication one way or the other.

Should PM<sub>2.5</sub> become a PSD pollutant, then certain permitting actions in the future would have the effect of "triggering" various aspects of the PSD permitting process on a regional basis. These regions, so triggered, would in all likelihood coincide with the boundaries of initial area designations. Hence, areas that are too large can lead to overly burdensome requirements in preparing a PSD permit application that have no bearing on the air quality in the region surrounding the actual project.

Thus, for the reasons cited above, the state is interested in making its initial area recommendations applicable to discrete, legally defined areas. The classifications themselves are based on air monitoring data, population, topography, and jurisdictional boundaries.

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<sup>1</sup> EPA has said, for now, that it will rely on the 1999 definitions of Metropolitan Statistical Areas. These areas have, however, been redefined as recently as 2003. Utah is anticipating that EPA will eventually use the more recent definitions.

**For Further Information**

The submittal of any further documentation which EPA determines is necessary to verify or otherwise meet the requirements of sections 110 (a) (1) or 172 of the Act, will be submitted by Richard Sprott, Director, Division of Air Quality. Any questions or requests concerning this submittal should be addressed to Mr. Sprott at (801)536-0072.

Attachments

1 – Table

2 – Map

**ATTACHMENT 1. INITIAL PM<sub>2.5</sub> DESIGNATIONS FOR ALL AREAS IN UTAH, AS OF FEBRUARY 13, 2004**

The following table summarizes the State of Utah's initial recommendation concerning area designations for PM<sub>2.5</sub> in all areas of Utah.

<b>County</b>	<b>Attainment Areas</b>	<b>Unclassifiable Areas</b>	<b>Nonattainment Areas</b>
Box Elder	The area surrounding Brigham City, as described by the following Townships or the portions of the following Townships in Box Elder County: T9N 2W, T9N R1W, T8N 2W	All other Townships or portions of Townships in Box Elder County	None
Cache	The Cache Valley, below 6500 ft. msl. This area is described by the following list of Townships or the portions of the following Townships in Cache County: T15N R1E, T15N R2W, T15N R1W, T14N R2W, T14N R1W, T14N R1E, T13N R2W, T13N R1W, T13N R1E, T12N R2W, T12N R1W, T12N R1E, T11N R1W, T11N R1E, T10N R1W, T10N R1E, T9N R1E	All other Townships or portions of Townships in Cache County	None
Davis	The portion of the Wasatch Front residing in Davis County, as described by the following Townships or the portions of the following Townships in Davis County: T5N R3W, T5N R2W, T5N R1W, T4N R2W, T4N R1W, T3N R1W, T3N R1E, T2N R1W, T2N R1E, T1N R1W, T1N R1E	All other Townships or portions of Townships in Davis County	None
Juab	None	Each Township or portions of Townships in Juab County	None
Kane	None	Each Township or portions of Townships in Juab County	None
Morgan	None	Each Township or portions of Townships in Morgan County	None

County	Attainment Areas	Unclassifiable Areas	Nonattainment Areas
Salt Lake	The portion of the Wasatch Front residing in Salt Lake County, as described by the following Townships or the portions of the following Townships in Salt Lake County: T1N 2W, T1N R1W, T1N R1E, T1S R3W, T1S 2W, T1S R1W, T1S R1E, T1S R3W, T1S 2W, T1S 1W, T1S R1E, T3S R3W, T3S 2W, T3S R1W, T3S R1E, T4S R3W, T4S 2W, T4S R1W, T4S R1E	All other Townships or portions of Townships in Salt Lake County	None
Tooele	The area surrounding Grantsville, as described by the following Townships or the portions of the following Townships in Tooele County: T1S R6W, T1S R5W, T1S R4W, T3S R6W, T3S R5W, T3S R4W, T4S R6W, T4S R5W, T4S R4W	All other Townships or portions of Townships in Tooele County	None
Utah	The portion of the Wasatch Front residing in Utah County, as described by the following Townships or the portions of the following Townships in Utah County: T4S 2W, T4S R1W, T4S R1E, T4S R2E, T5S 2W, T5S R1W, T5S R1E, T5S R2E, T6S R3W, T6S 2W, T6S R1W, T6S R2E, T6S R3E, T6S R1E, T7S R3W, T7S 2W, T7S R1W, T7S R1E, T7S R2E, T7S R3E, T8S R3W, T8S 2W, T8S R1W, T8S R3E, T8S R2E, T8S R1E, T9S R3W, T9S 2W, T9S R1E, T9S R3E, T9S R2E, T9S R1W, T10S 2W, T10S R2E, T10S R1E, T10S R1W, T11S 2W, T11S R1W, T1S 2W	All other Townships or portions of Townships in Utah County	None

<b>County</b>	<b>Attainment Areas</b>	<b>Unclassifiable Areas</b>	<b>Nonattainment Areas</b>
Weber	The portion of the Wasatch Front residing in Weber County, as described by the following Townships or the portions of the following Townships in Weber County: T7N 2W, T7N R1W, T7N R3W, T6N R3W, T6N 2W, T6N R1W, T5N R3W, T5N 2W, T5N R1W	All other Townships or portions of Townships in Weber County	None
Washington	None	Each Township or portions of Townships in Washington County	None
Beaver, Carbon, Daggett, Duchesne, Emery, Garfield, Grand, Iron, Millard, Piute, Rich, San Juan, Sanpete, Sevier, Summit, Uintah, Wasatch, Wayne		Each Township or portion of Townships in each county	



## Attachment 2: PM 2.5 Attainment Townships

