

February 15, 2023

Mat Carlile and Ryan Bares
Utah Division of Air Quality**RE: NOx Emission Controls for Natural Gas Fired Boilers (R307-15, R307-16)**

Western Resource Advocates (WRA) appreciates this opportunity to provide comments on DAQ's proposed rules for controlling NOx emissions from natural gas boilers (R307-15, R307-16). WRA is a regional nonprofit advocacy organization fighting climate change and its impacts to sustain the environment, economy, and people of the West. From our deep and scientific policy analysis to our highly effective legal teams, we're using every tool we have to drive state action and create a healthier and more equitable future for all our communities. As the region's go-to experts for more than three decades, our on-the-ground work advances clean energy, protects air, land, water, and wildlife.

COMMENTS

WRA supports DAQ's proposed rules for reducing emissions of NOx (a precursor to ozone pollution) from natural gas fired boilers. The rules enable incremental reductions in NOx emissions as industrial, commercial, and institutional entities along the Northern Wasatch Front (NWF) replace natural gas boilers over time and will eventually result in significant reductions of NOx emissions from these boilers.

Ozone pollution is highly detrimental to Utahns' health and well-being.¹ Ozone creates an inflammatory reaction that affects the entire body, much like smoking cigarettes. While the symptoms of ozone exposure usually manifest as difficulty breathing, the health effects are much broader, and include permanent loss of lung function, hospitalization for heart attacks and strokes, dangerous heart rhythms, increased risk of death and poor pregnancy outcomes, including still births. Data shows that on days with bad air, we see worse asthma attacks, an increase in heart attacks and increased risk of miscarriage. Children are at greatest risk from exposure to ozone because their lungs are still developing, and they are more likely to be active outdoors when ozone levels are high.

Research shows that low-income communities in the Salt Lake City area face disproportionate levels of pollution, and experience more adverse health outcomes because of it.² Furthermore, heat combined with air pollution is detrimental to human health, and disproportionately impacted communities bear a higher burden with both. Largely due to longstanding racist policies, major sources of air pollution are located in communities of color, as well as low-income neighborhoods.

¹ <https://www.deseret.com/utah/2022/3/30/23001643/air-pollution-utah-american-lung-association-electric-vehicles-electric-power-fossil-fuels>

² <https://attheu.utah.edu/facultystaff/persistent-inequitable-exposure-to-air-pollution-in-salt-lake-county-schools/>; <https://www.nytimes.com/2021/04/28/climate/air-pollution-minorities.html>.

REGIONAL OFFICES1429 North 1st Street
Suite 100
Phoenix • AZ 850042260 Baseline Road
Suite 200
Boulder • CO 803021536 Wynkoop Street
Suite 500
Denver • CO 80202343 East Alameda
Santa Fe • NM 87501550 W. Musser
Suite G
Carson City • NV 89703307 West 200 South
Suite 2000
Salt Lake City • UT 84101

Ozone pollution will continue to get worse in Utah due to climate change and rising temperatures. Thus, it is essential that Utah start making substantial reductions in precursor emissions as soon as possible. There are many solutions the state can pursue and WRA has and will continue to engage with DAQ to propose solutions for reducing ozone precursor emissions in the near and longer term. WRA supports approval and implementation of these boiler rules as one tool among many that the state can implement to bring the NWF into compliance with national ozone standards.

WRA understands that the NWF ozone problem is complex and that DAQ is not able to model or achieve attainment of the 2015 ozone standard with measures the agency is planning to implement as part of its forthcoming Moderate SIP (including these boiler rules). This means that considerably more emission reductions must be secured in order for the NWF to meet the ozone standard by the next, Serious nonattainment date of August 2027. Within the next couple of years, the state will need to be bolder in adopting measures that, collectively, mitigate the harms of ozone pollution as the state continues to grow.

Sincerely,

Sophie Hayes

Sophie Hayes
Utah Clean Energy Manager