



STATE OF UTAH

OFFICE OF THE GOVERNOR
SALT LAKE CITY, UTAH
84114-2220

SPENCER J. COX
GOVERNOR

DEIDRE M. HENDERSON
LIEUTENANT GOVERNOR

Feb. 27, 2023

Kathleen Becker, Regional Administrator
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Dear Administrator Becker,

On Nov. 7, 2022, Utah's Northern Wasatch Front (NWF) nonattainment area (NAA) was reclassified from marginal to moderate status for the 2015 8-hour average ozone National Ambient Air Quality Standard.¹ The state of Utah is required to identify and implement a 15% reduction in volatile organic compounds (VOCs) as part of its Clean Air Act (CAA) obligations. Given the significant reduction of VOC emissions implemented previously as part of Utah's fine particulate matter (PM_{2.5}) State Implementation Plans (SIP), identifying viable and SIP-creditable emission reductions has become exceedingly difficult. In an effort to meet these CAA requirements, the state of Utah's Division of Air Quality (UDAQ) has examined major industrial point sources that contribute to the degradation of the NWF NAA's airshed but are located outside of the existing boundary. This examination identified one source that met this criteria: US Magnesium, which is located in Tooele County on the southwestern edge of the Great Salt Lake and has significant amounts of highly reactive precursor emissions that contribute to both ozone and PM_{2.5} formation along the Wasatch Front.

Section 107(d)(3)(D) of the Clean Air Act states "[t]he Governor of any State may, on the Governor's own motion, submit to the Administrator a revised designation of any area or portion thereof within the State." Under this authority, I am requesting a revision to the current boundary of the NWF NAA such that US Magnesium will be included in the NAA allowing for emission reductions implemented at the facility to be included in ongoing SIP planning efforts.

¹ Determinations of Attainment by the Attainment Date, Extensions of the Attainment Date, and Reclassification of Areas Classified as Marginal for the 2015 Ozone National Ambient Air Quality Standards, 87 Fed. Reg. 60897, 60898 (Oct. 7, 2022).

Supporting documentation is being submitted by the UDAQ. If you or your staff have any questions regarding this request, please contact Bryce Bird, Director of the Utah Division of Air Quality, at (801) 536-4064.

Sincerely,

A handwritten signature in black ink, appearing to read "Spencer J. Cox". The signature is stylized with a large initial "S" and a prominent "C".

Spencer J. Cox
Governor