



State of Utah

GARY R. HERBERT  
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SPENCER J. COX  
Lieutenant Governor

Department of  
Environmental Quality

L. Scott Baird  
Executive Director

DIVISION OF AIR QUALITY  
Bryce C. Bird  
Director

DAQP-024-20

April 29, 2020

Gregory Sopkin, Regional Administrator  
U.S. EPA, Region 8  
1595 Wynkoop Street  
Denver, Colorado 80202

RE: Data Requirements Rule: 2019 SO<sub>2</sub> Emissions Annual Report

Dear Mr. Sopkin,

Section 51.1205(b) of the Data Requirements Rule (DRR) for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS) requires that, by July 1 of each year, air agencies submit to the EPA Regional Administrator a report that documents the annual SO<sub>2</sub> emissions of each applicable source, beginning with the calendar year after the effective date of the area’s initial designation. Utah has three DRR sources in two counties as shown in the table below.

DRR Source	County	Modeling Years			2015	2016	2017	2018	2019	% change from highest modeling year to 2019
		2012	2013	2014						
Hunter Power Plant	Emery	4,533.0	5,055.0	3,939.0	4,238.2	3,197.3	3,511.6	3,133.3	3,545.8	-29.9%
Huntington Power Plant	Emery	2,301.0	2,411.0	2,479.0	2,523.9	2,364.3	2,281.8	2,202.2	2,144.1	-13.5%
Intermountain Power Plant	Millard	3,553.0	4,727.0	4,372.0	3,768.3	2,784.9	2,483.6	2,484.7	2,021.2	-57.2%

Both counties were designated “attainment/unclassifiable” on January 9, 2018, using the modeling approach outlined in the DRR based upon actual emissions data from 2012 through 2014 from each DRR source. For each of the three DRR sources, the table shows the 2012-2014 emissions

data used in the Utah Division of Air Quality (UDAQ) modeling analysis as well as subsequent annual emissions data for 2015 through 2019.

As can be seen, SO<sub>2</sub> emissions for the most recent data year (2019) were lower than the highest modeling year emissions level for each source. Specifically, 2019 emissions were lower than 2013 emissions by 29.9% for the Hunter Power Plant. Similarly, 2019 emissions were lower than 2014 emissions by 13.5% for the Huntington Power Plant. Finally, 2019 emissions were lower than 2013 emissions by 57.2% for the Intermountain Power Plant.

Under §51.1205(b)(1), air agencies are required to include a recommendation in their annual report regarding whether additional modeling is needed to characterize air quality in areas with DRR sources. Because 2019 emissions levels have decreased compared to the modeling years 2012-2014, UDAQ recommends that no additional modeling is needed at this time to further characterize air quality in the areas surrounding Utah's DRR facilities.

As per §51.1205(b), this assessment will be posted on UDAQ's website for a period of 30 days for public inspection. If you have any questions or need additional information regarding this submittal, please contact Glade Sowards or my staff at 801-536-4020 or [gladesowards@utah.gov](mailto:gladesowards@utah.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Bryce C. Bird". The signature is fluid and cursive, with the first name being the most prominent.

Bryce C. Bird  
Director

BCB:GS:jf