



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 24, 2018

OFFICE OF THE  
ADMINISTRATOR

The Honorable Gary R. Herbert  
Governor of Utah  
Post Office Box 142220  
Salt Lake City, Utah 84114

Dear Governor Herbert:

This letter is in response to Utah's quantitative milestone reports dated March 23, 2018, which provide Utah's demonstrations that all measures found in the Salt Lake City, Utah, Provo, UT, and Logan, UT – Idaho fine particulate matter (PM<sub>2.5</sub>) Moderate area attainment plans (Moderate Area Plans) are being implemented and that quantitative milestones have been met (2017 Quantitative Milestone Reports). Section 189(c)(2) of the Clean Air Act and 40 CFR 51.1013(b) require the state to submit quantitative milestone reports no later than 90 days after each milestone date. The Moderate Area Plans were submitted on December 22, 2014, and the first quantitative milestones were to be met by December 31, 2017.

The Environmental Protection Agency has determined that the 2017 Quantitative Milestone Reports are adequate. The basis for this determination is set forth in the enclosures. This determination is based on the EPA's review of information contained in the Moderate Area Plans and additional information provided in the 2017 Quantitative Milestone Reports.

This determination of adequacy does not constitute an approval of any component of the Moderate Area Plans. The EPA will take final action on the Moderate Area Plans following notice-and-comment rulemaking procedures.

If your Division of Air Quality staff have any questions, they may contact Monica Morales, Air Program Director, EPA Region 8, at (303) 312-6936.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew R. Wheeler". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew R. Wheeler  
Acting Administrator

Enclosures:

- (1) EPA Evaluation of 2017 Quantitative Milestone Report for the Salt Lake City, UT Nonattainment Area
- (2) EPA Evaluation of 2017 Quantitative Milestone Report for the Provo, UT Nonattainment Area
- (3) EPA Evaluation of 2017 Quantitative Milestone Report for the Logan, UT-ID Nonattainment Area

## EPA's Evaluation of the 2017 Quantitative Milestone Report for the Salt Lake City, UT Nonattainment Area

### OVERVIEW

Section 189(c) of the Clean Air Act (CAA) requires that attainment plans for all PM<sub>2.5</sub> nonattainment areas contain quantitative milestones that (1) demonstrate reasonable further progress (RFP) and (2) are to be achieved every 3 years until the area is redesignated to attainment. For all areas designated nonattainment for the 2006 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS) before January 15, 2015, the starting point for the first 3-year period for quantitative milestones under CAA section 189(c) is December 31, 2014, and the first quantitative milestone date is December 31, 2017.<sup>1</sup> Quantitative milestones contained in an attainment plan for a Moderate and/or Serious nonattainment area must be constructed and documented by the state within their SIP, such that they can be tracked, quantified and/or measured adequately, by the agency, in order for the state to meet its milestone reporting obligations.<sup>2</sup> See 40 CFR 51.1013(a)(1)(iii).

Section 189(c)(2) of the CAA requires each state containing a PM<sub>2.5</sub> nonattainment area to submit, not later than 90 days after the date on which a milestone applicable to the area occurs, a demonstration that all measures in the approved state implementation plan (SIP) have been implemented and that the milestone has been met. We refer to these submissions as "quantitative milestone reports." Under the EPA's implementation rule for the PM<sub>2.5</sub> NAAQS,<sup>3</sup> each quantitative milestone report submitted by a state must include, at minimum: (1) a certification by the Governor or Governor's designee that the SIP control strategy is being implemented consistent with the RFP plan, as described in the applicable attainment plan; (2) technical support, including calculations, sufficient to document completion statistics for appropriate milestones and to demonstrate that the quantitative milestones have been satisfied and how the emissions reductions achieved to date compare to those required or scheduled to meet RFP; and (3) a discussion of whether the area will attain the applicable PM<sub>2.5</sub> NAAQS by the projected attainment date for the area.<sup>4</sup>

This enclosure contains the EPA's evaluation of the first quantitative milestone report submitted by the Utah Department of Air Quality (UDAQ) for the Salt Lake City, UT PM<sub>2.5</sub> nonattainment area. The Salt Lake City area is currently classified as Serious nonattainment for the 2006 PM<sub>2.5</sub> NAAQS; however, the 2017 Salt Lake City Quantitative Milestone Report ("Salt Lake City Report") addresses the CAA Moderate area obligation to submit a quantitative milestone report for the December 31, 2017 milestone. The EPA notes that the Moderate Area Plan for this area did not include specific quantitative milestones, which could consist of but are not limited to a discussion of the rules and regulations found in an attainment plan and how the reductions in emissions would correlate with the RFP plan. The state should address this requirement within a future SIP revision or plan. UDAQ has complied with the obligation to submit a quantitative milestone report through submission of the Salt Lake City Report. For purposes of the Salt Lake City Report, UDAQ presents a quantitative milestone report that is based on the achievement of specified amounts of emission reductions by the end of 2017 through implementation of existing and new control measures. The EPA notes that it has considered this form of

<sup>1</sup> 40 CFR 51.1013(a)(4).

<sup>2</sup> August 24, 2016 (81 FR 58010, 58063), Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements, final rule.

<sup>3</sup> 81 FR 58010 (August 24, 2016) (codified at 40 CFR part 51, subpart Z).

<sup>4</sup> 40 CFR 51.1013(b).

quantitative milestone report in other nonattainment area plans, including that for the Logan, UT-ID nonattainment area, and thus is evaluating the Salt Lake City Report with the expectation that the state will revise its nonattainment plan or submit a nonattainment plan to establish these quantitative milestones for this area. The Salt Lake City Report confirms that the control measures identified in the nonattainment plan are in effect and provides information on the emission reductions achieved by these measures. Based on this evaluation, we find that the Salt Lake City Report adequately demonstrates that the emission reductions in this area are sufficient to meet a December 31, 2017 milestone requirement.

### **SALT LAKE CITY, UTAH AREA CONTROL STRATEGY**

#### UDAQ Control Measures identified in Quantitative Milestone Report

The tables below list UDAQ's control measures in the Moderate Area Plan which will achieve reductions in emissions of direct PM<sub>2.5</sub> and the relevant precursors from 2010 base year emission levels.

<b>UDAQ Area Source Control Measure</b>	<b>EPA proposed approval</b>	<b>FR proposal cite</b>	<b>EPA final approval</b>	<b>FR final cite</b>
R307-302 – Solid Fuel Burning (Conditional Approval)	8/18/2016	81 FR 55156	10/19/2016	81 FR 71988
R307-303 – Commercial Cooking	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-309 – Fugitive Dust/Fugitive Emissions	9/14/17	82 FR 43205	-	-
R307-312 – Aggregate Processing Operations	8/18/2016	81 FR 55156	10/19/2016	81 FR 71988
R307-335 - Degreasing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-342 – Adhesives and Sealants	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-343 – Wood Manufacturing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-344 – Paper, Film, and Foil Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-345 – Fabric & Vinyl Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-346 – Metal Furniture Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-347 – Large Appliance Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-348 – Magnet Wire Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-349 – Flat Wood Panel Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-350 – Miscellaneous Metal Parts Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343

R307-351 – Graphic Arts	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-352 – Metal Containers	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-353 – Plastic Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-354 – Auto Body Refinishing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-355 – Aerospace Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-356 – Appliance Pilot Light	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-357 – Consumer Products	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-361 – Architectural Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343

<b>UDAQ Point Sources</b>	<b>UDAQ Point Source Control Measure</b>	<b>Status</b>
ATK Thiokol Promontory	ATK is to replace one of the two 71.1 MMBTU/hr boilers with ULNB, by January 2016, and operate the other as a standby. Also, possible VOC co-benefit from CO control required by 40 CFR part 60, subpart ZZZZ at I/C engines and gas turbines.	Approval Order (AO) issued October 5, 2016. Established ultra-low NOx limitations on one of the 71.1 MMBTU boilers.
Big West Refinery	At the FCC unit, Big West will install a flue gas filtration device (FGF) and use deSOx catalyst to meet the Subpart Ja FCCU limits for PM and SO <sub>2</sub> . Big West will also retrofit three boilers and replace the unifier charge heater with Ultra Low NOx burners and install a redundant SO <sub>2</sub> caustic scrubbing system to be operated in the event of SRU malfunction or planning outage. All modifications are to be implemented no later than January 1, 2019.	AO issued May 18, 2015. Established all RACT control measures.
Bountiful City	None	None

Power		
Central Valley Water	None	AO issued October 17, 2018. Established as a non-SIP source.
CER Generation II LLC – WVC	None	None
Chemical Lime Company (Lhoist North America)	Required to install a fabric filter (baghouse) to control PM and selective non-catalytic reduction (SNCR) technology to control NOx, at the rotary kiln, once the facility has resumed normal operations.	Source is still in idle mode. No plans for future operations to date. Baghouse still required prior to start-up.
Chevron Refinery	Chevron is to replace the three boilers (Boilers 1, 2, and 4) with ULNB capable of achieving a NOx emission rate of 0.03 lb/MMBTU.	AO issued November 16, 2016. Completing these requirements.
Geneva Rock Point of the Mountain	R307-312 “Aggregate Processing Operations for PM <sub>2.5</sub> Nonattainment Areas” established emission standards for sources in the aggregate processing industry, including aggregate processing equipment, hot mix asphalt plants, and concrete batch plants. Geneva Rock was required to comply with this rule.	Source required to comply with R307-312.
Great Salt Lake Minerals – Production Plant	GSLM will be required to replace wet-scrubbers AH-013 and AH-502 with control equipment that will meet a PM <sub>2.5</sub> limit of 0.01 gr/dscf. LNB technology with a minimum NOx control efficiency of 77% will be installed on all burners. Dryer units D-002 and D-004 were to be removed by October 1, 2017. By January 1, 2017, all other dryers (>5 MMBTU/hr) were required to meet a NOx limit of 20 ppm <sub>dv</sub>	AO issued June 11, 2015, January 15, 2016 and March 9, 2017. Completed these requirements.
Hexcel Corporation, Salt Lake Operations	None	None

Hill Air Force Base Main	None	None
Holly Refining Marketing	Holly plans to install a second complete combustion FCCU which will also utilize WGS for particulate and SO <sub>2</sub> control, LoTOx will be used in conjunction for NOx control. Also planned is the electrification of existing compressors and installation of SCR on the three process heaters (10H1, 30H1 and 30 H2) and Boiler #8. All modifications are to be expressed in the emission limitations of the SIP no later than January 1, 2019.	AO issued November 18, 2013. Completing these requirements.
Kennecott Mine Concentrator	None	None
Kennecott NC-UPP-Lab-Tailings	LNB with OFA and SCR constitute RACT for Unit 4. This will be required by January 1, 2018. Units 1-3 are to be taken out of service by January 1, 2018.	AO issued December 1, 2011. Completing these requirements.
Kennecott Smelter & Refinery	None	None
Nucor Steel	None	None
Olympia Sales Company	By July 31, 2018, a baghouse control device shall replace the existing cyclone separators to control the exhaust streams from the mill, door and sanding areas.	AO issued January 17, 2018. Established as a minor source and completing these requirements.
PacifiCorp Gadsby	None	None
Proctor & Gamble Paper Products Co.	None	None
Tesoro Refinery	A WGS system is to be installed at the FCCU by January 1, 2019. This, in conjunction with the use of LoTOx catalyst will control SO <sub>2</sub> and NOx emissions. Additional NOx control will result from controls at the ultraformer unit and installation of ULNB on the F-1 heaters. These	AO issued April 7, 2016. Completing these requirements.

	upgrades are expected by the end of 2015. Also, a flare gas recovery system is to be installed by January 1, 2019.	
University of Utah	Units 1 and 3 at the UCHQTP will be upgraded with O <sub>2</sub> trim systems (to lower NO <sub>x</sub> emissions) by the end of 2014. By 2017, the second of two 40 MMBTU/hr boilers will come on line to replace unit 5 at the LCHWTP. This will also reduce NO <sub>x</sub> emissions, as will the decommissioning and replacement of units 3 and 4, which will take place in phases in between 2019 and 2021.	AO issued September 30, 2013. Completing the O <sub>2</sub> trim systems and replacement of unit 5 requirements.
Vulcraft	None	None
Wasatch Integrated IE	Installation of SNCR technology on each of the two municipal waste combustors for the reduction of NO <sub>x</sub> emissions.	Facility closed May 2017.

## EPA'S EVALUATION OF THE 2017 QUANTITATIVE MILESTONE REPORT

### (1) Certification by the Governor or Governor's Designee

40 CFR 51.1013(b)(1): The quantitative milestone report must include certification by the Governor or Governor's designee that the state's attainment plan control strategy is being implemented as described in the applicable attainment plan.

UDAQ submitted the Salt Lake City Report by letter dated March 23, 2018, from Gary R. Herbert, the Utah Governor. The Governor's letter states that the 2017 Quantitative Milestone Report demonstrates that all measures in the Moderate Area Plan have been implemented. We find this letter adequate to meet this requirement.

### (2) Quantitative Milestone Report Technical Support

40 CFR 51.1013(b)(2): The quantitative milestone report must contain technical support, including calculations, sufficient to document completion statistics for appropriate milestones and to demonstrate that the quantitative milestones have been satisfied and how the emissions reductions achieved to date compare to those required or scheduled to meet RFP.

The Salt Lake City Report presents 2017 quantitative milestone information documenting specific amounts of emissions reductions reflected in the emissions inventory, which are achieved through implementation of the RFP control strategy. The Salt Lake City Report identifies the 2017 RFP emissions targets for direct PM<sub>2.5</sub> and the relevant precursors and provides quantitative information demonstrating that those emissions targets have been met through implementation of the SIP control

strategy. Additionally, the Salt Lake City Report discusses the implementation status of each of the primary control measures for direct PM<sub>2.5</sub> and the relevant precursors that achieved the necessary emission reductions. We find the Salt Lake City Report adequate to meet this requirement.

**(3) Attainment by the Applicable Attainment Date**

40 CFR 51.1013(b)(3): The quantitative milestone report must include a discussion of whether the PM<sub>2.5</sub> NAAQS will be attained by the projected attainment date for the area.

The Salt Lake City Report notes that the Moderate Area Plan contained a demonstration that attainment by the Moderate area attainment date was impracticable and that the EPA reclassified the Salt Lake City area as Serious. After reclassification, the statutory attainment date is December 31, 2019. The Salt Lake City Report examines emission reductions and trends in concentrations, acknowledges uncertainty due to the meteorology and does not conclude that the area will attain by the December 31, 2019 attainment date. We find the discussion in the Salt Lake City Report adequate to meet this requirement.

**CONCLUSION**

Based on these evaluations, we have determined that the state has adequately addressed the quantitative milestone report requirement in the 2017 Quantitative Milestone Report for the Salt Lake City, Utah area for purposes of the 2006 PM<sub>2.5</sub> NAAQS.

## EPA's Evaluation of the 2017 Quantitative Milestone Report for the Provo, UT Nonattainment Area

### OVERVIEW

Section 189(c) of the CAA requires that attainment plans for all PM<sub>2.5</sub> nonattainment areas contain quantitative milestones that (1) demonstrate RFP and (2) are to be achieved every 3 years until the area is redesignated to attainment. For all areas designated nonattainment for the 2006 24-hour PM<sub>2.5</sub> NAAQS before January 15, 2015, the starting point for the first 3-year period for quantitative milestones under CAA section 189(c) is December 31, 2014, and the first quantitative milestone date is December 31, 2017.<sup>5</sup> Quantitative milestones contained in an attainment plan for a Moderate and/or Serious nonattainment area must be constructed and documented by the state within their SIP, such that they can be tracked, quantified and/or measured adequately, by the agency, in order for the state to meet its milestone reporting obligations.<sup>6</sup> See 40 CFR 51.1013(a)(1)(iii).

Section 189(c)(2) of the CAA requires each state containing a PM<sub>2.5</sub> nonattainment area to submit, not later than 90 days after the date on which a milestone applicable to the area occurs, a demonstration that all measures in the approved SIP have been implemented and that the milestone has been met. We refer to these submissions as "quantitative milestone reports." Under the EPA's implementation rule for the PM<sub>2.5</sub> NAAQS,<sup>7</sup> each quantitative milestone report submitted by a state must include, at minimum: (1) a certification by the Governor or Governor's designee that the SIP control strategy is being implemented consistent with the RFP plan, as described in the applicable attainment plan; (2) technical support, including calculations, sufficient to document completion statistics for appropriate milestones and to demonstrate that the quantitative milestones have been satisfied and how the emissions reductions achieved to date compare to those required or scheduled to meet RFP; and (3) a discussion of whether the area will attain the applicable PM<sub>2.5</sub> NAAQS by the projected attainment date for the area.<sup>8</sup>

This enclosure contains the EPA's evaluation of the first quantitative milestone report submitted by the UDAQ for the Provo, UT PM<sub>2.5</sub> nonattainment area. The Provo area is currently classified as Serious nonattainment for the 2006 PM<sub>2.5</sub> NAAQS; however, the 2017 Quantitative Milestone Report ("Provo Report") addresses the CAA Moderate area obligation to submit a quantitative milestone report for the December 31, 2017 milestone. The EPA notes that the Moderate Area Plan for this area did not include specific quantitative milestones, which could include but are not limited to a discussion of the rules and regulations found in an attainment plan and how the reductions in emissions would correlate with the RFP plan. The state should address this requirement within a future SIP revision or plan. UDAQ has complied with the obligation to submit a quantitative milestone report through submission of the Provo Report. For purposes of the Provo Report, UDAQ presents a quantitative milestone report that is based on the achievement of specified amounts of emission reductions by the end of 2017 through implementation of existing and new control measures. The EPA notes that it has considered this form of quantitative milestone report in other nonattainment area plans, including that for the Logan, UT-ID nonattainment area, and thus is evaluating the Provo Report with the expectation that the state will revise its nonattainment plan or submit a new plan to establish these quantitative milestones for this

<sup>5</sup> 40 CFR 51.1013(a)(4).

<sup>6</sup> August 24, 2016 (81 FR 58010, 58063), Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements, final rule.

<sup>7</sup> 81 FR 58010 (August 24, 2016) (codified at 40 CFR part 51, subpart Z).

<sup>8</sup> 40 CFR 51.1013(b).

area. The Provo Report confirms that the control measures identified in the nonattainment plan are in effect and provides information on the emission reductions achieved by these measures. Based on this evaluation, we find that the Provo Report adequately demonstrates that the emission reductions in this area are sufficient to meet a December 31, 2017 milestone requirement.

**PROVO, UTAH AREA CONTROL STRATEGY**

UDAQ Control Measures identified in Quantitative Milestone Report

The tables below list UDAQ's control measures in the Moderate Area Plan which will achieve reductions in emissions of direct PM<sub>2.5</sub> and the relevant precursors from 2010 base year emission levels.

<b>UDAQ Area Source Control Measure</b>	<b>EPA proposed approval</b>	<b>FR proposal cite</b>	<b>EPA final approval</b>	<b>FR final cite</b>
R307-302 – Solid Fuel Burning (Conditional Approval)	8/18/2016	81 FR 55156	10/19/2016	81 FR 71988
R307-303 – Commercial Cooking	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
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R307-335 - Degreasing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-342 – Adhesives and Sealants	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
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R307-361 – Architectural Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343

UDAQ Point Sources	UDAQ Point Source Control Measure	Status
BYU	LNB on Units 4 & 6 with FGR by 12/31/18	Will install a new gas turbine instead.
Geneva Nitrogen	None	Facility closure October 2016.
Pacificorp – Lakeside	None	None
PSCIP	Mass balance VOC limit on painting operations and good combustion practices at the annealing furnace.	Last inspected on 8/22/17; source is in compliance
Payson City	Possible VOC co-benefit from CO control required by 40 CFR part 60, subpart ZZZZ.	Equipment (Oxy-Cats) have been installed.
Provo City	Oxidation catalysts to control VOC (as co-benefit to meeting CO limits in 40 CFR part 60, subpart ZZZZ).	5 new I/C engines, all with Oxy-Cats.
Springville City	Possible VOC co-benefit from CO control required by 40 CFR part 60, subpart ZZZZ.	Equipment (Oxy-Cats) have been installed.

## **EPA'S EVALUATION OF THE 2017 QUANTITATIVE MILESTONE REPORT**

### **(1) Certification by the Governor or Governor's Designee**

40 CFR 51.1013(b)(1): The quantitative milestone report must include certification by the Governor or Governor's designee that the state's attainment plan control strategy is being implemented as described in the applicable attainment plan.

UDAQ submitted the Provo Report by letter dated March 23, 2018, from Gary R. Herbert, the Utah Governor. The Governor's letter states that the 2017 Quantitative Milestone Report demonstrates that all measures in the Moderate Area Plan have been implemented. We find this letter adequate to meet this requirement.

### **(2) Quantitative Milestone Report Technical Support**

40 CFR 51.1013(b)(2): The quantitative milestone report must contain technical support, including calculations, sufficient to document completion statistics for appropriate milestones and to demonstrate that the quantitative milestones have been satisfied and how the emissions reductions achieved to date compare to those required or scheduled to meet RFP.

The Provo Report presents 2017 quantitative milestone information documenting specific amounts of emissions reductions reflected in the emissions inventory, which are achieved through implementation of the RFP control strategy. The Provo Report identifies the 2017 RFP emissions targets for direct PM<sub>2.5</sub> and the relevant precursors and provides quantitative information demonstrating that those emissions targets have been met through implementation of the SIP control strategy. Additionally, the Provo Report discusses the implementation status of each of the primary control measures for direct PM<sub>2.5</sub> and the relevant precursors that achieved the necessary emission reductions. We find the Provo Report adequate to meet this requirement.

### **(3) Attainment by the Applicable Attainment Date**

40 CFR 51.1013(b)(3): The quantitative milestone report must include a discussion of whether the PM<sub>2.5</sub> NAAQS will be attained by the projected attainment date for the area.

The Provo Report notes that the Moderate Area Plan contained a demonstration that attainment by the Moderate area attainment date was impracticable and that the EPA reclassified the Provo area as Serious. After reclassification, the statutory attainment date is December 31, 2019. The Provo Report examines emission reductions and trends in concentrations, acknowledges uncertainty due to the meteorology and does not conclude that the area will attain by the December 31, 2019 attainment date. We find the discussion in the Provo Report adequate to meet this requirement.

## **CONCLUSION**

Based on these evaluations, we have determined that the state has adequately addressed the quantitative milestone report requirement in the 2017 Quantitative Milestone Report for the Provo, Utah area for purposes of the 2006 PM<sub>2.5</sub> NAAQS.

## **EPA's Evaluation of the 2017 Quantitative Milestone Report for the Logan, UT-ID Nonattainment Area**

### **OVERVIEW**

Section 189(c) of the CAA requires that attainment plans for all PM<sub>2.5</sub> nonattainment areas contain quantitative milestones that (1) demonstrate RFP and (2) are to be achieved every 3 years until the area is redesignated to attainment. For all areas designated nonattainment for the 2006 24-hour PM<sub>2.5</sub> NAAQS before January 15, 2015, the starting point for the first 3-year period for quantitative milestones under CAA section 189(c) is December 31, 2014, and the first quantitative milestone date is December 31, 2017.<sup>9</sup> Quantitative milestones contained in an attainment plan for a Moderate and/or Serious nonattainment area must be constructed and documented by the state within their SIP, such that they can be tracked, quantified and/or measured adequately, by the agency, in order for the state to meet its milestone reporting obligations.<sup>10</sup> See 40 CFR 51.1013(a)(1)(iii).

Section 189(c)(2) of the CAA requires each state containing a PM<sub>2.5</sub> nonattainment area to submit, not later than 90 days after the date on which a milestone applicable to the area occurs, a demonstration that all measures in the approved SIP have been implemented and that the milestone has been met. We refer to these submissions as "quantitative milestone reports." Under the EPA's implementation rule for the PM<sub>2.5</sub> NAAQS,<sup>11</sup> each quantitative milestone report submitted by a state must include, at minimum: (1) a certification by the Governor or Governor's designee that the SIP control strategy is being implemented consistent with the RFP plan, as described in the applicable attainment plan; (2) technical support, including calculations, sufficient to document completion statistics for appropriate milestones and to demonstrate that the quantitative milestones have been satisfied and how the emissions reductions achieved to date compare to those required or scheduled to meet RFP; and (3) a discussion of whether the area will attain the applicable PM<sub>2.5</sub> NAAQS by the projected attainment date for the area.<sup>12</sup>

This enclosure contains the EPA's evaluation of the quantitative milestone report submitted by UDAQ for the Logan, UT-ID PM<sub>2.5</sub> nonattainment area, which is classified as Moderate nonattainment for the 2006 PM<sub>2.5</sub> NAAQS. UDAQ elected to base the quantitative milestone for this NAAQS on the achievement of specified amounts of emission reductions by the end of 2017 through implementation of existing control measures. The 2017 Quantitative Milestone Report ("Logan Report") confirms that these control measures are in effect and provides information on the emission reductions achieved by these measures, consistent with the RFP demonstration in the Moderate Area Plan. Based on this evaluation, we find that the Logan Report adequately demonstrates that the December 31, 2017 milestones have been met.

### **LOGAN, UT-ID AREA CONTROL STRATEGY**

#### **UDAQ Control Measures Identified in the Report**

The table below lists UDAQs implemented control measures that contribute to RFP in the Moderate Area Plan which will achieve reductions in emissions of direct PM<sub>2.5</sub> and the relevant precursors from 2010 base year emission levels.

<sup>9</sup> 40 CFR 51.1013(a)(4).

<sup>10</sup> August 24, 2016 (81 FR 58010, 58063), Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements, final rule.

<sup>11</sup> 81 FR 58010 (August 24, 2016) (codified at 40 CFR part 51, subpart Z).

<sup>12</sup> 40 CFR 51.1013(b).

<b>UDAQ Control Measure</b>		<b>EPA proposed approval</b>	<b>FR proposal cite</b>	<b>EPA final approval</b>	<b>FR final cite</b>
<b>Area Source Rules</b>	R307-302 – Solid Fuel Burning (Conditional Approval)	8/18/2016	81 FR 55156	10/19/2016	81 FR 71988
	R307-303 – Commercial Cooking	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-309 – Fugitive Dust/Fugitive Emissions	9/14/17	82 FR 43205	-	-
	R307-312 – Aggregate Processing Operations	8/18/2016	81 FR 55156	10/19/2016	81 FR 71988
	R307-335 - Degreasing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-342 – Adhesives and Sealants	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-343 – Wood Manufacturing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-344 – Paper, Film, and Foil Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-345 – Fabric & Vinyl Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-346 – Metal Furniture Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-347 – Large Appliance Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-348 – Magnet Wire Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-349 – Flat Wood Panel Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-350 – Miscellaneous Metal Parts Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-351 – Graphic Arts	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-352 – Metal Containers	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-353 – Plastic Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-354 – Auto Body Refinishing	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-355 – Aerospace Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
R307-356 – Appliance Pilot Light	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343	

	R307-357 – Consumer Products	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	R307-361 – Architectural Coating	8/25/2015	80 FR 51499	2/25/2016	81 FR 9343
	<b>On-Road Mobile Sources – Cache County I/M Program</b>	11/10/2014	79 FR 66670	9/9/2015	80 FR 54237
	<b>Off-Road Mobile Sources</b>	12/4/2017	82 FR 57183	-	-
	<b>Point Sources</b>	12/4/2017	82 FR 57183	-	-

## EPA'S EVALUATION OF THE 2017 QUANTITATIVE MILESTONE REPORT

### (1) Certification by the Governor or Governor's Designee

40 CFR 51.1013(b)(1): The quantitative milestone report must include a certification by the Governor or Governor's designee that the state's attainment plan control strategy is being implemented as described in the applicable attainment plan.

UDAQ submitted the Logan Report by letter dated March 23, 2018, from Gary R. Herbert, the Utah Governor. The Governor's letter states that the 2017 Quantitative Milestone Report demonstrates that all measures in the Moderate Area Plan have been implemented. We find this letter adequate to meet this requirement.

### (2) Quantitative Milestone Report Technical Support

40 CFR 51.1013(b)(2): The quantitative milestone report must contain technical support, including calculations, sufficient to document completion statistics for appropriate milestones and to demonstrate that the quantitative milestones have been satisfied and how the emissions reductions achieved to date compare to those required or scheduled to meet RFP.

UDAQ elected to base the 2017 quantitative milestone in the Moderate Area Plan on specific amounts of emissions reductions reflected in the emissions inventory, which are achieved through implementation of the RFP control strategy. The Logan Report identifies the 2017 RFP emissions targets for direct PM<sub>2.5</sub> and relevant precursors in the Moderate Area Plan and provides quantitative information demonstrating that those emissions targets have been met through implementation of the SIP control strategy. Additionally, the Logan Report discusses the implementation status of each of the primary control measures for direct PM<sub>2.5</sub> and the relevant precursors that achieved the necessary emission reductions. We find the Logan Report adequate to meet this requirement.

### (3) Attainment by the Applicable Attainment Date

40 CFR 51.1013(b)(3): The quantitative milestone report must include a discussion of whether the PM<sub>2.5</sub> NAAQS will be attained by the projected attainment date for the area.

The Logan Report notes that the Logan UT-ID area received two 1-year extensions of the attainment date, and that based on data for 2017 (which had not been fully certified at the time the Logan Report was submitted) it appeared that the area would attain by the attainment date of December 31, 2017. In addition, the Logan Report, while acknowledging uncertainties due to meteorology, considered trends in emissions and concentrations to confirm this prediction. We find the Logan Report to be adequate for this element.<sup>13</sup>

## **CONCLUSION**

Based on these evaluations, we have determined that the 2017 Quantitative Milestone Report adequately addresses each of the required components and adequately demonstrates that the Logan, UT-ID area's 2017 quantitative milestones for purposes of the 2006 PM<sub>2.5</sub> NAAQS have been met.

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<sup>13</sup> For a more robust discussion of the Logan UT-ID area's progress to attainment, see the EPA's proposed finding of attainment and clean data determination for the Logan, UT-ID nonattainment area (Docket: EPA-R10-2018-0316).