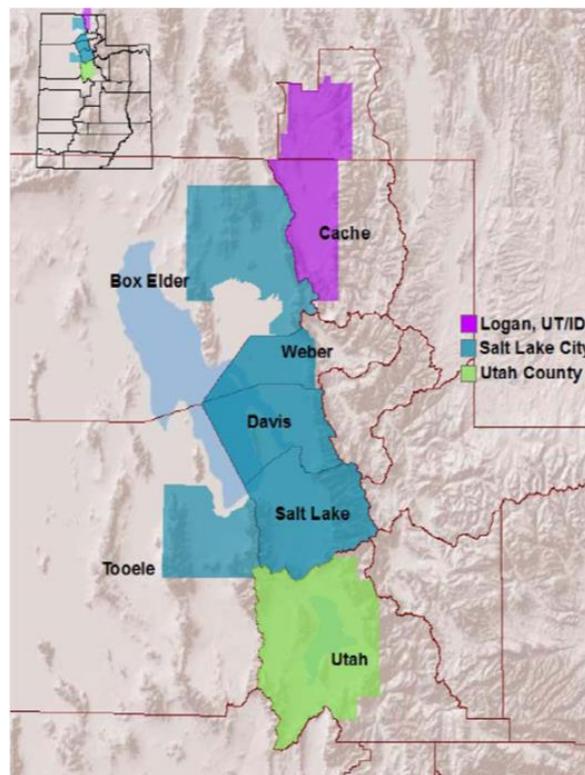




Fact Sheet for Utah's Serious Area PM2.5 SIP Development

PM2.5 Nonattainment Areas are classified as either Moderate or Serious areas. All areas are initially classified as Moderate. Areas will be reclassified as Serious if, as of their attainment date, they are unable to monitor attainment using the three most recent years of air quality data.

All three of Utah's PM2.5 nonattainment areas were found to be exceeding the 24-hour health standard as of their attainment date (December 31, 2015), and the EPA has proposed to reclassify each of the areas to Serious.



Utah's PM2.5 Nonattainment Areas

Once reclassified, the Clean Air Act will require a new SIP for each area. These Serious Area plans are to be "in addition to" the Moderate Area plans Utah has already submitted, but they will essentially build upon what has already been accomplished.

The new Serious Area plans are due to EPA at the end of 2017, and will differ from the Moderate Area plans in the following respects:

- Include updated inventories of emissions, both a base year (2014) and an attainment year which must be identified in the plan and could be as early as 2019 or as late as 2024.
- The air pollutants of concern are PM_{2.5} and all its precursors (SO_x, NO_x, VOC, and ammonia).
 - DAQ will again evaluate whether it is appropriate to require emission controls at sources of ammonia. A similar analysis in the Moderate Area SIP concluded that it would not result in lower concentrations of PM_{2.5}.
- Application of Best Available Control Technology (BACT). By contrast, the Moderate Area SIP had required Reasonably Available Controls (RACT).
 - This applies to Area and Mobile Sources as well as to Point Sources.
 - These two benchmarks (RACT and BACT) are very similar and are really separated only by the number of dollars feasibly spent to eliminate a ton of air pollution.
 - Practically speaking, many of the control measures approved into the Moderate Area SIPs will be re-evaluated, and will likely also meet the BACT criteria. In other instances however, existing control measures will need to be upgraded.
 - Apart from the re-evaluation of existing control measures, Utah will continue to look for sources of emissions that are still uncontrolled.
- If it is impracticable to model attainment of the PM_{2.5} standard in 2019, Utah will have to request an extension of the attainment date. Should that be the case, the necessary level of controls would rise from BACT to what is called the Most Stringent Measures (MSM).
 - MSM would achieve the most stringent emissions reductions from among those control measures which are either included in any SIP for any other NAAQS or that have been achieved in practice in any state, and that can feasibly be implemented in the nonattainment area.
 - Even if the air quality model indicates that it is possible to attain the standard by 2019, sources in the nonattainment areas could still be required to apply MSM if, upon reaching the attainment date, the air monitoring data does not support a showing of attainment.