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ASSOCIATION

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Delivered via e-mail

Bryce Bird, Director
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, Utah 84114-4820
bbird@utah.gov
tgunter@utah.gov

Re: Utah Manufacturers Association Comments on Proposed Rulemaking to Amend Utah State Implementation Plan, Section IX, Part A.31

Dear Mr. Bird and UDAQ staff,

The Utah Manufacturers Association (UMA) submits the following comments on the “Major Stationary Source Precursor Demonstration for NO_x, SO_x, VOC, and NH₃ in the Salt Lake City 24-hour PM_{2.5} Serious Nonattainment Area” and on the proposed revisions to the Utah State Implementation Plan, Part A.31, Fine Particulate Matter, i.e, the attainment demonstration.¹

As a century-old trade association representing the interests of more than 1,000 companies that form the backbone of Utah’s manufacturing industry, UMA understands the significance of the Serious PM_{2.5} SIP for the Salt Lake City Nonattainment Area. UMA appreciates the diligent and professional work that the Utah Division of Air Quality has put into analyzing and preparing the Serious PM_{2.5} SIP. UMA acknowledges that solving the area’s air quality issues is not a simple task and UMA commends UDAQ for the work that it has done.

Indeed, UMA’s members are acutely aware of the PM_{2.5} issues that our region faces as many of our members are subject to and directly regulated by the existing and proposed PM_{2.5} SIP for the Salt Lake City Nonattainment Area. Our members have previously shouldered significant costs to substantially curtail emissions in an effort, led by UDAQ, to bring the area into attainment. And to be clear, UMA and its members *do not* advocate backing away from any previous determinations that require area and point sources to reduce emissions. But UMA also believes that there must be a recognition that, given the prior control requirements and reductions in emissions, further controls from point sources will result in diminishing returns in terms of air quality improvements. Consequently, UMA believes that the controls considered for implementation by UDAQ ought to be targeted measures that are strategically directed at controls that are *necessary* to bring the area into attainment. As such, UMA incorporates and adopts the

¹ Both proposals were published in the Utah State Bulletin on October 1, 2018. See 2018 19 Utah Bull., pp. 1 & 31.

comments submitted by the Utah Petroleum Association (UPA) which are also being submitted today. UMA believes that the position taken in the UPA comments with regard to a precursor demonstration and the proposed SIP Part A strike the right balance in terms of identifying what additional controls are necessary for a Serious PM2.5 SIP for the Salt Lake City Nonattainment Area.

UMA notes a correction needed in the major stationary source precursor demonstration undergoing public comment. Table 1 on page 6 and Table B-1 on page B-2 of the precursor demonstration incorrectly identify UAMPS, instead of UMPA, as the owner of the West Valley Power Plant. We understand the source of the error in the precursor demonstration to be an emissions inventory for the PM2.5 State Implementation Plan posted on the UDAQ website at the link provided for Table 1, which should also be corrected on the website.² UMA requests that these be corrected.

Thank you for considering this comment; UMA and its members look forward to working with you and the UDAQ staff on air quality issues.

Regards

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

Todd R. Bingham
President/CEO
Utah Manufacturers Association

² <https://deq.utah.gov/legacy/pollutants/p/particulate-matter/pm25/serious-area-state-implementation-plans/posted-inventories.htm> (last accessed on October 30, 2018)