THE UNIVERSITY OF UTAH

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UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
NOV 21 2018
DIVISION OF AIR QUALITY

November 20, 2018

Thomas Gunter
Public Comment
Utah Division of Air Quality
PO Box 144820
Salt Lake City, UT 84114-4820

RE: Public Comment – Stack Testing Standards
Utah rule R307-165-2
Rev. to Section IX, Part H, Emission Limits

Dear Mr. Gunter:

The University of Utah (University) has considered the changes proposed in the Utah Division of Air Quality's (UDAQ) most recent revision of the Part H conditions of the $PM_{2.5}$ Serious Nonattainment State Implementation Plan (SIP) out for public comment. We offer the following comments in the context our own permit and operations.

The University has considered the impact of the proposed new rules related to increased stack-testing, and have concluded these rules would burden operations without any commensurate benefits such as increased efficiency or reduced emissions.

Existing maintenance and monitoring practices are effective and compliant:

- Regular maintenance. Established boiler maintenance programs ensure that the equipment is operating as designed and meetings manufacturer's recommended tuning and maintenance practices.
- Fuel Flow Monitoring. The University closely monitors fuel use across campus to ensure compliance with a natural gas cap and to improve campus operations. The University's Title V permit (Permit Number 3500063003 Condition II.B.3.c) requires the University to track fuel usage on a monthly basis. Additionally, EPA's Compliance Assurance Monitoring (CAM) Technical Guidance Document Section A.27 establishes Fuel Flow Rate monitoring as an acceptable monitoring approach to ensure emission limits are met.
- Consistent Fuel Usage. The University of Utah uses natural gas to fuel its boilers, allowing for consistent operations and results and consistent emissions.

Stack testing preparation and execution requires a significant time commitment from environmental staff, and has the potential to distract from other environmental efforts across campus. The University of Utah concurs with the cost assessment provided by UDAQ; annual stack testing would result in an estimated $30,000 per year in added stack testing expenses. Further, this added activity threatens to displace more impactful sustainability initiatives; staff time is more effectively used in pollution prevention programs and reducing environmental impacts.

If you have any questions or comments about the information presented in this letter, please do not hesitate to contact Michael Brehm at (801) 585-1617.

Sincerely,

John E. Nixon
Vice President for Administrative Services

cc: Martha D. Shaub, University of Utah
Michael D. Brehm, University of Utah
Sam Jensen, University of Utah
Brian Mensinger, Trinity Consultants