DAQ-090-19

**M E M O R A N D U M**

**TO:** Air Quality Board

**THROUGH:** Bryce C. Bird, Executive Secretary

**FROM:** Becky Close, Environmental Scientist

**DATE:** August 22, 2019

**SUBJECT:** PROPOSE FOR PUBLIC COMMENT: SIP Subsection IX.A.28: PM2.5 Maintenance Provisions for Logan, UT-ID.

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On December 3, 2014, UDAQ submitted to the Environmental Protection Agency (EPA) the Utah State Implementation Plan Subsection IX.A.23: *Control Measures for Area and Point Sources, Fine Particulate Matter,* *PM2.5 for the Logan, UT-ID Nonattainment Area* (Moderate SIP). The Moderate SIP includes all necessary elements to support the demonstration, control strategy, and implementation of the moderate area designation attainment plan.

Under the EPA’s Clean Data Policy, EPA finalized a clean data determination for the Logan Nonattainment Area (Logan NAA) on October 19, 2018. The Clean Data Determination shows that the Logan NAA attained the 2006 24-hr PM2.5 national ambient air quality standard (NAAQS) based on validated monitored data from 2015-2017.

A finding that the area has attained the standard does not mean the area is automatically reclassified to attainment status. For that to happen, EPA must take action to redesignate an area from nonattainment back to attainment. The Clean Air Act (CAA) outlines five requirements that a nonattainment area must satisfy for redesignation to occur, and this proposed SIP addresses those requirements:

1. Attainment of the NAAQS
2. A fully approved Attainment SIP
3. A demonstration that improvements in air quality are due to permanent and enforceable emissions reductions
4. A demonstration that the State has met requirements applicable to the area under CAA Section 110 and Part D
5. A fully approved maintenance plan

Requirements 1 through 4 are addressed in the first section of this SIP as part of the documentation for the redesignation request. The maintenance plan is also included in this SIP package and includes a modeling demonstration that the Logan, UT-ID NAA continues to attain the NAAQS out to 2035, with an intermediate year check in of 2026. As noted in EPA guidance, the EPA approval action on SIP elements and the redesignation request may occur simultaneously. Therefore, some serious SIP elements may still be pending approval and will likely be approved by EPA concurrently with the redesignation to attainment status.

Recommendation: Staff recommends that the Board propose SIP Subsection IX.A.28: PM2.5 Maintenance Provisions for Logan, UT-ID, for a 30-day public comment period.