

**UTAH STATE  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR QUALITY**

**UTAH AIR QUALITY BOARD MEETING**

February 7, 2001

PLEASE PRINT

NAME	AFFILIATION
SUSAN HARDY	MAG
Kathy Vandenberg	WCAE
MIKE STRONG	EG&G
Mike Park	ATK
Kris Snow	SAIC
STEVE ALDER	Utah County
Dick Snell	EG+G
Lydia Salmen	Kennecott Utah Copper
Savahn Wright	IHI Env.
Mike Astin	Phillips 66
<del>John [unclear]</del>	WES
Elden Singh	WDT
Kip Billings	WFR C
BILL HAUZE	METEOROLOGICAL SOLUTIONS, INC.
Nina Dougherty	Sierra Club



# State of Utah

## Utah Air Quality Board

Michael O. Leavitt  
Governor

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Richard R. Olson  
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### AIR QUALITY BOARD MEETING

### FINAL AGENDA

Wednesday, February 7, 2001  
1:30 p.m.

168 N. 1950 W. (Building #2) Room 101

- I. Call to Order
- II. Date of Next Meeting
- III. Approval of Minutes of the January 3, 2001, Board Meeting
- IV. **Propose for Public Comment:** 1996 Emissions Inventory for Ogden City  
(**Bill Reiss**)
- V. **Approval Order Modification:** University of Utah Hot Water Plant  
(**Milka Radulovic**)
- VI. **Approval Order Modification:** Murray City Corporation Power Plant  
(**Milka Radulovic**)
- VII. **Variance Extension Request:** Holnam Incorporated (**John Jenks**)
- VIII. **Variance Request:** Inland Refining Incorporated (**John Jenks**)
- IX. Information Items
  - A. Compliance Activities for December 2000 (**Gisela Jensen**)
  - B. HAPS Compliance Activities for December 2000 (**Marv Maxell**)
  - C. Monitoring Data for January 2001 (**Bob Dalley**)
  - D. SIPs Update (**Jan Miller**)
- X. Miscellaneous

*\* \$ to write*  
*\* 2000... PC was...*  
*\* ...*

## **Proposed For Public Comment: 1996 Inventory for Ogden City**

*\* I'll try to keep it brief*  
*\* ... (Hawaii)*

### Background

- \* Ogden City became a nonattainment area for PM10 in September 1995
- \* In 1997, EPA proposed a new form of the PM10 health standard. Since Ogden City had never violated this new standard, DAQ ceased working on a SIP.
- \* In 1999, the DC Circuit Court of Appeals vacated the new PM10 standard. This meant, under Part D of the Clean Air Act, that the requirement to submit a SIP was still outstanding.
- \* Later that year, EPA provided areas such as Ogden City with a means to satisfy the Part D requirements of the Act. It's called the PM10 Clean Data Areas Approach (see attached).
- \* In March 2000, Governor Leavitt sent EPA a letter officially requesting that it use this approach to declare that Utah had met the requirements under Part D of the Act; most notably, to submit a PM10 SIP for Ogden City (see attached).
- \* In order for EPA to do so, DAQ must still submit an emissions inventory for the area, which corresponds to a period during which the area was monitoring attainment of the health standard. There has not been an exceedance of the PM10 standard in Ogden City since 1993.
- \* 1996 was such a time, and since DAQ was already compiling a more regionally comprehensive inventory for that year, we decided to use a subset of that inventory for this purpose. So that's what this is, and a summary of the emissions appears here as an attachment.
- \* This inventory will NOT be used to establish a budget for conformity purposes. Nor will it constitute a cap or limit industrial sources in any way.
- \* DAQ is recommending that this inventory be released for a 30-day period of public review, after which it would be forwarded to EPA as part of the PM10 Clean Data Areas Approach.

## Ogden City Inventory of PM10 And its Precursors: SO2 and NOx Representing Winter of 1996

**Summary Table**

	PM10	SO2	NOx
Mobile Sources	1.22	0.15	3.90
Area Sources	0.81	0.51	1.53
Point Sources	0.39	0.13	0.59
<b>Total.....</b>	<b>2.42</b>	<b>0.79</b>	<b>6.02</b>

**Mobile Sources:**

tons per winter weekday	PM10	SO2	NOx
Tailpipe	0.08	0.15	3.90
Tire Wear	0.01		
Fugitive Dust	1.13		
<b>Total.....</b>	<b>1.22</b>	<b>0.15</b>	<b>3.90</b>

**Area Sources:**

tons per winter weekday	PM10	SO2	NOx
Wood Burning	0.61	0.01	0.06
Coal Burning	0.05	0.00	0.00
Natural Gas	0.11	0.01	0.65
Fuel Oil	0.02	0.42	0.05
Aircraft	0.00	0.00	0.00
Railroad	0.01	0.05	0.68
Misc. Non-Road	0.01	0.02	0.09
<b>Total.....</b>	<b>0.81</b>	<b>0.51</b>	<b>1.53</b>

**Point Sources:**

tons per year	PM10	SO2	NOx	tons per winter weekday	PM10	SO2	NOx	days/yr	reference
Cargill Inc. - Feed Divn.	17.01	0.00	0.00	Cargill Inc. - Feed Divn.	0.07	0.00	0.00	260	Form F2
Cargill Inc. - Flour Divn.	18.20	0.13	8.90	Cargill Inc. - Flour Divn.	0.07	0.00	0.03	260	Form F2
Defense Logistics Agency	43.67	34.25	119.88	Defense Logistics Agency	0.17	0.13	0.46	260	F2, F6a, F6b, F12, F14
Fresenius Medical Care	2.13	0.11	16.21	Fresenius Medical Care	0.01	0.00	0.04	362	Form F2, F3a
Hurco Industries	4.75	0.00	0.00	Hurco Industries	0.02	0.00	0.00	260	Form F6a
Koch Agricultural Co.	22.40	0.00	0.00	Koch Agricultural Co.	0.06	0.00	0.00	365	Form F2, F6a
Levolor Home Fashions	0.30	0.00	3.80	Levolor Home Fashions	0.00	0.00	0.02	240	Form F2
Weber State University	0.98	0.04	9.37	Weber State University	0.00	0.00	0.03	317.5	*Form F2
<b>Total.....</b>	<b>109.44</b>	<b>34.53</b>	<b>158.16</b>	<b>Total.....</b>	<b>0.39</b>	<b>0.13</b>	<b>0.59</b>		

\* note that the days/yr entry for this source was contrived as a weighted average of operating percentages, during the first calendar quarter, for each of the four boilers.

Note that point sources reported their emissions for an annual averaging period (1996), and that these emission totals were divided by the number of operational days reported by each facility.

3) Control measures for the area which were responsible for attainment must be approved by EPA. The EPA would also need to find that the State had adopted Reasonably Available Control Measures (RACM). To that end, EPA Region VIII has already identified a number of control measures that fit this description. They are: open burning rule, visible emissions rule, fugitive dust rule, and vehicle inspection and maintenance.

Accordingly, the State and EPA are in agreement that Ogden City meets the necessary criteria. As such, **this letter will serve to officially request that EPA make notice in the Federal Register that the State of Utah has, in fact, met its requirements under CAA Part D (section 172) to submit a nonattainment PM10 SIP for the area defined as Ogden City.** By way of said notice, the State understands and acknowledges the following:

- \* Requirements for developing Reasonable Further Progress (RFP) demonstrations and contingency measures (under CAA section 172) will be waived.
- \* Any sanction clocks that may be running due to failure to submit or disapproval of any Part D requirement will be terminated.
- \* This action will not constitute a redesignation under CAA section 107. If the State wishes that Ogden City be redesignated to attainment then subsequent action must be taken under CAA section 175.
- \* Transportation Conformity demonstrations will still be required using the "build/no build" test or the "no greater than 1990" test. However, the "emission budget" test will not be required because the requirements for an attainment demonstration and RFP, which establish these budgets, will no longer apply.
- \* The applicable tests for General Conformity still apply.
- \* The State will continue to operate its PM10 monitoring network in accordance with CFR part 58.
- \* The State must produce a basic emissions inventory for Ogden City to the satisfaction of EPA Region VIII.

The submittal of said emissions inventory and any additional documentation which EPA determines is necessary to make its finding or otherwise meet the requirements of section 172 of the Act will be submitted by Ursula Kramer, Director, Division of Air Quality, and any questions your agency may have concerning this submittal should be addressed to Ms. Kramer at (801) 536-4022.

Sincerely,

Michael O. Leavitt  
Governor

MOL:DRN:dco

**October 18, 1999**  
**PM<sub>10</sub> Clean Data Areas Approach**

This approach applies the clean data policy concept for ozone to selected PM<sub>10</sub> nonattainment areas to get the control measures for these areas approved into the SIP. The approach only applies to PM<sub>10</sub> areas with simple PM<sub>10</sub> source problems, such as residential wood combustion, fugitive dust problems, etc. If an area meets the following requirements the state will no longer be required to develop an attainment demonstration. The three requirements are:

- \* First, the area must be attaining the PM<sub>10</sub> NAAQS with the three most recent years of quality assured air quality data.
  - \* Second, the state must continue to operate an appropriate PM<sub>10</sub> air quality monitoring network, in accordance with 40 CFR part 58, in order to verify the attainment status of the area.
  - \* Third, the control measures for the area, which were responsible for bringing the area into attainment, must be approved by EPA. EPA would also need to find that the area has adopted RACM / RACT, and make a finding that the area attained the 24-hr and annual PM<sub>10</sub> NAAQS.
- For those areas that qualify for application of the clean data approach the requirement for developing RFP demonstrations and contingency measures are waived. Also, any sanction clocks that may be running due to failure to submit, or disapproval of some of the previously mentioned requirements are stopped. However, any requirement that is tied solely to designation or classification remain in effect, e.g., NSR, RACM, RACT.

Areas are still required to demonstrate transportation conformity using the build/no-build test, or the no-greater-than-1990 test. The emissions budget test would not be required, because the requirements for an attainment demonstration and RFP, which establish the budgets, no longer apply. The state, however, must still produce a basic emissions inventory for the area. The applicable tests for general conformity still apply.

- The action to approve the SIP, however, would not be a § 107 (d) redesignation. The area will only be redesignated to attainment if the state submits an approvable § 175A maintenance plan.
- The federal register actions taken to approve the SIP's should be done on a case by case basis, and the appropriate language concerning the clean data approach will be inserted into each notice.

March 30, 2000

DAQP-046-00

William Yellowtail  
Regional Administrator  
EPA Region VIII  
One Denver Place  
999 18th Street, Suite 500  
Denver, Colorado 80202-2405

Dear Mr. Yellowtail:

Re: PM10 SIP Obligation: Ogden City

This letter concerns Ogden City, an area that is presently designated "nonattainment" for PM10. Utah is still under obligation to submit a State Implementation Plan (SIP) revision satisfying the requirements of Part D of the Clean Air Act.

The State has not submitted a Part D SIP for Ogden City because of the EPA's intent to revise the National Ambient Air Quality Standards (NAAQS) for PM10. Under EPA's previous "Transition Policy," Ogden City was identified as an area that was presently attaining the old (pre-1997) NAAQS for PM10 and had never violated the new standard. As such, EPA had indicated that the old NAAQS would be revoked provided that: 1) the Part D requirements had been met, and 2) that the State had the means and authority, under CAA section 110, to implement the new NAAQS. Furthermore, EPA indicated that, for areas such as Ogden City, the improvement in air quality was at least partially due to those control measures which applied to the entire state or to nonattainment areas in general, and that it would be inappropriate to require any new control strategies. Thus, the Part D requirements were considered to be satisfied because these control measures were already incorporated into the Utah SIP.

The Utah Division of Air Quality and EPA Region VIII were in agreement that each of the necessary criteria had been met, and the State officially communicated as much in two letters dated March 27, 1998, and June 25, 1998, respectively.

Subsequently, the American Trucking Association challenged (among other things) EPA's authority to implement a revised PM10 standard, and on May 14, 1999, the United States Court of Appeals for the D.C. Circuit ruled to vacate the new PM10 NAAQS. Consequently, Utah's obligation to satisfy the Part D requirements, as they pertain to the old NAAQS, is still outstanding.

In a further attempt to provide areas such as Ogden City with an avenue by which to satisfy these outstanding Part D requirements, EPA has recently made available a PM10 Clean Data Areas Approach. As with the Transition Policy approach, the area must meet certain criteria in order to qualify. These criteria are as follows:

- 1) The area must be attaining the (pre-1997) PM10 standards based on the last three years of air monitoring data. Ogden City meets this criteria.
- 2) The State must continue to operate an appropriate PM10 monitoring network in accordance with CFR part 58 in order to verify the attainment status of the area. The State is quite agreeable to maintaining its PM10 monitoring efforts in Ogden City.



# State of Utah

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Executive Director

Richard W. Sprott  
Director

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(801) 536-4414 T.D.D.

### MEMORANDUM

TO: Air Quality Board DAQ-008-01

THROUGH: Rick Sprott, Executive Secretary

FROM: Milka M. Radulovic, Environmental Engineer

DATE: February 7, 2001

SUBJECT: Approval Order Modification: University of Utah Hot Water Plant

The University of Utah (U of U) is currently modifying their Approval Order (AO) number DAQE-148-97, dated February 27, 1997, for the existing heating plant. The plant is a major source in the PM<sub>10</sub> SIP and under the Utah Administrative Code is required to get Air Quality Board approval before an Approval Order can be issued.

The U of U is requesting approval to lower NO<sub>x</sub> hourly emission rates limits for the plant's existing boilers when fired on natural gas and to decrease total annual natural gas consumption limit for these boilers from 1,192 million cubic feet to 945.8. There will be no physical changes at the plant. The requested change is the first step in the permitting process for a new heating plant which will be added to serve the U of U upper campus.

It is requested that the NO<sub>x</sub> limit for Boilers No. 1 and 2 be changed from 12.2 lb/hr to 10 lb/hr, and for Boilers No. 3, 4 and 5 from 50 lb/hr to 25 lb/hr. Estimated emission change as a result of this request, in tons per year, will be as follows: (-) 0.95 of PM<sub>10</sub>, (-) 0.09 of SO<sub>2</sub>, (-) 125.84 of NO<sub>x</sub>, (-) 4.01 of CO, and (-) 0.23 of VOC. Utah Administrative Code, R307-305-2, Particulate Emission Limitations and Operating Parameters (PM10), requires Air Quality Board approval for modifications to SIP sources.

The staff recommends that the Air Quality Board approve this modification.





# State of Utah

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### MEMORANDUM

TO: Air Quality Board DAQ-009-01

THROUGH: Richard W. Sprott, Executive Secretary

FROM: Milka M. Radulovic, Environmental Engineer

DATE: January 29, 2001

SUBJECT: Approval Order Modification: Murray City Corporation Power Plant

Murray City Power (MCP), a department of Murray City Corporation, is currently modifying their Approval Order (AO), DAQE-759-98 for the Murray City Power Generation Plant (plant). The plant is currently a major source for Title V and operates under Operating Permit Number 350004401, dated March 11, 1999. The plant is also listed under Utah PM<sub>10</sub> State Implementation Plan, Section IX.H.2.b.KK.

MCP has proposed to lower the plant's current allowable NO<sub>x</sub> emissions and has requested to permit the plant as a synthetic minor source for NO<sub>x</sub> emissions. Also, MCP is proposing to install three gas turbines, each with a maximum power output of 13.5 MW. All of the three proposed turbines will use Dry-Low NO<sub>x</sub> combustion technology (SoLoNO<sub>x</sub>) to reduce NO<sub>x</sub> emissions. In addition, MCP proposed to install one 1000 hp diesel-fired back-up generator for emergency turbine startup when the power is not available from the grid. MCP will use their existing and approved IC engines as internal peaking units until one turbine is operational and thereafter shall use them as standby units. MCP will remove all four IC engines when the three new turbines are commercially operational.

Changes in the annual allowable emissions, in tons, as a result of the requested modification to DAQE-739-98, will be as follows: +9.28 of PM<sub>10</sub>, -1.18 of SO<sub>2</sub>, -150.1 of NO<sub>x</sub>, 25 of CO, +5.1 of VOC, and +4.67 of HAPs (3.83 of Formaldehyde)

Utah Administrative Code, R307-305-2. Particulate Emission Limitations and Operating Parameters (PM10), requires Air Quality Board approval for modifications to SIP sources. A 30-day public comment period was held for these modifications and no comments were received.

The staff recommends that the Air Quality Board approve the issuance of this AO.



# State of Utah

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### MEMORANDUM

TO: Air Quality Board DAQ-010-01

THROUGH: Richard W. Sprott, Executive Secretary

FROM: John Jenks, Environmental Engineer

DATE: January 29, 2001

SUBJECT: Variance Extension Request: Holnam Incorporated

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On March 4, 1999, Holnam Incorporated was granted a variance pursuant to Utah Administrative Code (UAC) R307-102-4. This variance was for Condition 8 of the Approval Order DAQE-552-96 which gives a limitation of 251 lbs/hr of NO<sub>x</sub> emitted by the cement kiln baghouse. This variance was granted by the Air Quality Board in DAQE-283-99, extended on August 2, 2000, and will expire on February 8, 2001.

On January 18, 2001, Holnam requested an new extension to the above variance in order to allow the state and federal agencies time to finish their review of the Prevention of Significant Deterioration (PSD) permit application and to set an allowable limit for NO<sub>x</sub> emissions from the source. The PSD permit Notice of Intent (NOI) has been submitted, and is undergoing final review by these agencies. The modeling review has been completed, and the State anticipates issuing a final PSD permit in the coming months; however, this permit will not be issued before the expiration of the variance granted by the Board.

Staff recommends that Holnam Incorporated be granted an extension to the August 2, 2000, variance from the NO<sub>x</sub> limitation until May 2, 2001. This variance will also expire upon issuance of a new PSD Approval Order to Holnam, Incorporated. The following conditions will continue to be imposed during the extended variance period:

1. Holnam Incorporated will not exceed the National Ambient Air Quality Standards (NAAQS) for any of the emitted pollutants.
2. Holnam Incorporated will demonstrate compliance with the NAAQS by continuing to operate the equipment necessary to continuously monitor NO<sub>x</sub> stack gas emissions for the purposes of establishing a NO<sub>x</sub> emission limit for PSD applicability. The equipment will be operated under the Protocol for Conducting the NO<sub>x</sub> Emission Monitoring that was submitted to and approved by UDAQ.
3. Holnam Incorporated will operate their kiln and associated equipment using best operating practices as prescribed by the manufacturer during all periods the plant is in operation.

**HOLNAM INC**  
Devil's Slide Plant  
6055 E. Croydon Road  
Morgan, UT 84050  
Phone: 801-829-6821  
Fax: 801-829-2100

**HOLNAM**

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To: Department of Environmental Quality  
Division of Air Quality  
Mr. Richard Sprott, Executive Secretary  
150 North 1950 West  
Salt Lake City, Utah 84114-4820

From: Holnam Inc.  
Kevin Ovard, Environmental Manager  
6055 E. Croydon Road  
Morgan, Utah 84050  
810-829-2122

Date: January 18, 2001

Subject: Variance Request DAQE-283-99

Dear Mr. Sprott

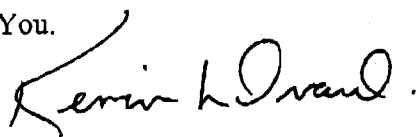
Attached is a variance request for an extension of time, to be presented to the Air Quality Board at the February scheduled meeting. We have operated under request DAQE-283-99 for the past several months. This current request expires at the February Board meeting.

A NOI to replace the variance and further extensions was submitted to the State in May of 2000. Since that time we have delivered to the State additional material, and further modeling details in support of the original NOI. The final materials were delivered December 22, 2001. We are asking for an extension at this time to allow the State ample time to review and send to comment the documents delivered earlier. This time should also allow for 2 thirty-day comment periods, and time for the State to respond to any comments and issue a permit as a final result of the NOI.

This variance request was originally delivered to the Department in December, however it was not presented to the Board in the January Meeting. The reason it was not presented, was a decision by the State, and their desire to have the completed additional material prior to the creation of the Board member packet. This information was completed and all materials are in the hands of the State. For these reasons we are requesting this extension.

We at Holnam, appreciate your consideration of this request and would answer any questions that you or your staff may have.

Thank You.

A handwritten signature in cursive script that reads "Kevin Ovard". The signature is written in black ink and is positioned to the right of the typed text "Thank You."

Kevin Ovard  
Holnam Inc.

C:\My Documents\NOX\2000 Var Req cover Letter #2.doc

lead to the loss of a strategic building material for current and planned infrastructure projects in and around the State of Utah. This loss in available local cement will require cement to be brought in from out of state locations during this time of National cement shortage. Even if imported cement is available, it will likely result in higher material costs for the construction projects planned throughout the State and region.

8. *List all possible alternatives in lieu of obtaining a variance. Discuss the advantages and disadvantages of each alternative. A cost estimate for each alternative must be included.*

A reduction of our current production levels has been discussed. Product demand is at a maximum. We have not observed a reduction in production rate corresponding to a significant reduction in NOx. The high intense temperature is needed for the clinking process regardless of a rate amount. We are not confident that the plant can run at such reduced rates to achieve the Approval Order condition. Efficiency is substantially reduced at lower rates. Increased fuel would be required to operate due to the design of the preheater. Emissions may potentially be higher under extended reduced operating conditions. For reasons stated in question #7 we feel that curtailment is not an option.

9. *State the advantages and disadvantages to nearby residents if the variance is granted.*

As a result of the air modeling already conducted, we feel that there would be no advantage or disadvantage to any of the neighboring residents for health reasons. There are a number of local residents that work at this facility. A curtailment or closure could present an economic disadvantage to many of the nearby residents.

10. *State how the applicant will reduce excess emissions to the maximum extent feasible during the period the variance is in effect.*

Holnam has investigated approaches to reduce NOx emissions. Reports have been sent to the Department each quarter on the NOx concentrations and attempts to reduce these emissions. The results of modeling, investigations and achievable technology have been included in the Notice of Intent for the PSD permit.

11. *State the facts showing why operations under such variance are not likely to cause a nuisance, as defined in 76-10-803, Utah code Annotated.*

After review of the Utah Code definition to cause a nuisance, we feel that this does not apply to this situation.

12. *The source is located in a: ( ) non-attainment area  
(X) attainment area*

*If located in a non-attainment area, will emissions resulting from approval of the variance cause a new violation of the National Ambient Air Quality Standards? Include all supporting data and calculations, such as emission estimates and*

*modeling data. Give the exact location of the activity or business for which a variance is sought. If located in an attainment area, give the exact location of the activity or business for which a variance is sought.*

The facility is located in south end of Morgan county just off Interstate 84. The plant produces portland cement for distribution to the residents of the State of Utah and the surrounding area. See item #4 for the specific piccc of equipment.

13. *Is the source located within a Class I area, as defined by R307-1-3.6.1.A, Utah Air Conservation Rules ( )Yes (X) No*

*If Yes, has compliance with the requirements of and within the increments provided I Section 165 of the Federal Clean Air Act, or in the case of nitrogen dioxide increments, with Title 40 of the Code of Federal Regulations, Section 51.66 been achieved? Include all supporting data and calculations.*

14. *Is the variance request considered an emergency situation? ( )Yes (X) No*  
*If yes, explain in detail.*

15. *Are other regulatory agencies or permit authorities involved in the variance request?*  
*( )Yes (X) No*

*If yes, state the agency name(s), contact person(s), phone number(s), and reason for their involvement.*

  
\_\_\_\_\_  
Signature of Responsible Person

18 Jan 2001  
Date

Variance Request  
 State of Utah  
 Department of Environmental Quality  
 Division of Air Quality

Instructions: Complete each item below. Use additional pages if necessary. If there is a change in any of the information listed below, report the changes to the Utah Division of Air Quality immediately. You will be notified of the date, and time of the hearing or the determination made by the Executive Secretary.

Submit form to: Richard W. Sprott, Acting Executive Secretary – Department of Environmental Quality, Division of Air Quality, 150 North 1950 West, Salt Lake City, Utah, 84114-4820. Phone: (801-536-4000)

Holnam Inc.  
 Business Name

6055 E. Croydon Road Same Same  
 Street Address (Location of Business) Mailing Address - Street

Morgan Morgan Same Same  
 City County City State

84050 Same  
 Zip Code Zip Code

Applicant is: ( ) Individual  
 ( ) Partnership  
 (X) Corporation  
 ( ) Government  
 ( ) Other Entity

Kevin Ovard  
 Contact – Indicate the name and telephone number of the person authorized to receive notices.

List names and addresses of all partners, Officers or other persons in control  
Chester Goodson Plant Manager  
Address -- Same as above

801-829-2122  
 Telephone Number

1. ( ) *Initial Variance* (X) *Renewal*
2. The purpose of variance request (check one)
  - A. ( ) no practicable means known or available for the adequate prevention, abatement, or control of the air pollution involved.
  - B. ( ) compliance with the requirements from which variance is sought will require that measures, because of their extent of cost, must be spread over a long period of time.
  - C. (X) to relieve or prevent hardship of a kind other than provided for in 2A or 2b.

3. *State what the business or activity from which the variance is requested consists of. List all past, present, and future businesses and activities*

Holnam, Inc. is a portland cement manufacturing business located in Morgan County.

4. *Describe the article, machine, equipment, or contrivance involved in the request.*

Portland Cement is produced using a 5 stage preheater, precalciner and rotary kiln in combination as a large complex combustion device. Raw materials (limestone and other additives), are burned in this system to form clinker. The clinker is later ground to a fine particle size called cement. During the burning of the clinker NOx (nitrous oxide compounds) is formed. The NOx level emitted from the stack exceeded the approval order limit at the time of the compliance testing. We have operated under the current variance to collect information to be submitted to the Department at this time.

5. *State the rule(s) or approval order condition(s) from which the applicant seeks relief.*

Approval order DAQE-552-96 dated May 13, 1996. Section 8, emission rate from the kiln exhaust, specifically the NOx value of 251 lbs. / hour.

6. *State the specific time period(s) for which the variance is requested.*

We request a variance to be in effect from the February meeting for a period of 4 months or until the June 2001 meeting. Holnam asks for the extension time based on the additional time it has taken to answer questions regarding the modeling and the methodology to be used in the modeling effort. The gathering of data, and the actual modeling has extended the period of time needed for completion. The original PSD permit NOI was delivered to the State during the month of May. The updated material was delivered to the State on December 22, 2000.

7. *State why compliance with the rule or approval order from which variance is sought produce serious hardship without equal or greater benefits to the public. If financial hardship, include itemized and total costs of compliance.*

In the extreme, enforced compliance with the current Approval Order (AO) could result in the closure of the facility. This would result in the loss of 110 jobs. At best, compliance with the current allowable NOx emission rate will likely result in the plant operating at less than capacity. There is a potential, due to the design of the facility, that it would be inoperable at lower than normal operating conditions. Neither of these results are acceptable to Holnam. There is no available information showing any health risk to the public that would support either of these two scenarios.

The variance will allow the plant to continue to operate at capacity during the time period requested in question 6. Operation at less than capacity will potentially





# State of Utah

## DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

Michael O. Leavitt  
Governor

Dianne R. Nielson, Ph.D.  
Executive Director

Richard W. Sprott  
Director

150 North 1950 West  
P.O. Box 144820  
Salt Lake City, Utah 84114-4820  
(801) 536-4000 Voice  
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(801) 536-4414 T.D.D.

### MEMORANDUM

TO: Air Quality Board

DAQ-011-01

THROUGH: Richard W. Sprott, Executive Secretary

FROM: John Jenks, Environmental Engineer

DATE: January 29, 2001

SUBJECT: Variance Request: Inland Refining Incorporated

Inland Refining Incorporated, located at 2355 South, 1100 West, in Woods Cross, has requested a variance from their existing Approval Order (AO) (DAQE-0004-98, dated January 7, 1998). The current AO limits Inland Refining Inc. to using only natural gas as a fuel, except during periods of natural gas curtailment. The request asks that Inland Refining Inc. be able to use other fuels, specifically fuel oils #2, #4, #5 and #6 and LPG, to be used as primary fuels in addition to using natural gas.

This change will have no impact on Inland Refining's allowable emissions, but will result in increases in actual emissions during this time period. These changes are as follows:

#### Actual Emissions Increase During Variance Period

<u>Pollutant</u>	<u>Tons/3-month Variance Period</u>	<u>Tons/year comparison</u>
PM10 .....	3.01 .....	4.04
SOx .....	21.53 .....	86.12
NOx .....	14.23 .....	56.92
CO .....	1.42 .....	5.68
VOC .....	0.1 .....	0.4
Total HAPs .....	0.06 .....	0.24

The estimates in this proposal are based on existing levels of production, applicable AP-42 emission factors, and assumptions on the weight percent sulfur in the fuel oils being less than or equal to 0.50%.

While Inland Refining Incorporated is operating under an AO for their Woods Cross plant, this plant is also listed in the Salt Lake County portion of the PM10 SIP under the name of Crysen Refining. The SIP details specific requirements of emission controls, and control equipment (known hereafter as Reasonably Achievable Control Technology - RACT). RACT was determined and applied to both source categories and specific sources as part of the control strategies for Salt Lake County. Both the general RACT provisions for refineries and the source specific requirements of Section IX, Part H of the SIP require Inland Refining Inc. (Crysen Refining) to use only natural gas as fuel except during periods of natural gas curtailment.

In order to address these concerns, Inland Refining has submitted a Notice of Intent to modify the Approval Order listed above, redefining RACT for this plant. Should it become necessary, Inland Refining will also request a change to their subpart of Section IX of the SIP.

The variance request is to cover the next three months. The following conditions will be imposed during the variance period:

1. Inland Refining will use only natural gas, LPG, or fuel oil (#2, #4, #5 or #6).
2. Fuel oils will be limited to containing no more than 0.2% sulfur by weight.
3. Each separate load of fuel oil shall be certified as to the constituent composition either by the fuel supplier or by Inland Refinery's own testing as per ASTM Method D2880-71 or D-4294-89 or approved equivalent.
4. Fuel certification reports shall be available on site for each delivered load of fuel oil.
5. Inland Refining will use only natural gas as fuel during periods of inversion, defined as periods of yellow or red burn days as established by the Division of Air Quality.
6. The variance will expire on May 2, 2001.

With the above listed conditions and limitations, the staff recommends that the variance request be granted to Inland Refining.

VARIANCE REQUEST

STATE OF UTAH  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR QUALITY  
(801) 536-4000

INSTRUCTIONS: Complete each item below. Use additional pages if necessary. If there is a change in any of the information listed below, report the changes to the Utah Division of Air Quality immediately. You will be notified of the date, place, and time of the hearing or the determination made by the Executive Secretary. Phone:

Submit form to: Rick Sprott, Director  
Utah Division of Air Quality  
150 North 1950 West  
PO Box 144820  
Salt Lake City, Utah, 84114-4820

Inland Refining Incorporated  
Business Name

2355 South 1100 West  
Street Address (Location of Business)

Woods Cross                      Davis County  
City                                      County

84087  
Zip Code

2355 South 1100 West  
Mailing Address

Woods Cross                      UT  
City                                      State

84087  
Zip Code

Dave McSwain  
Contact - Name of the person authorized to receive notices

(801)298-3211  
Contact Telephone Number

- Applicant is:    ( ) Individual  
                      ( ) Partnership  
                      (X) Corporation  
                      ( ) Government  
                      ( ) Other Entity

List names and addresses of all partners, officers, or other persons in control.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.        (X) Initial variance    ( ) Renewal
  
2.        The purpose of variance request (check one):
  - A. ( )    no practicable means known or available for the adequate prevention, abatement, or control of the air pollution involved.
  
  - B. ( )    compliance with the requirements from which variance is sought will require that measures, because of their extent of cost, must be spread over a long period of time.
  
  - C. (X)    to relieve or prevent hardship of a kind other than provided for in 2A or 2B.

3. Describe the business or activity for which the variance is requested. List all past, present, and future businesses and activities.

Petroleum products refinery

4. Describe the article, machine, equipment, or contrivance involved in the request.

One (1) Reformer Furnace (#H-101), One (1) HDS Furnace (#H-102), One (1) Number 1 Crude Unit Furnace (#F-201), One (1) Preflash Furnace (#F-231), One (1) Number 2 Crude Unit Furnace (#F-251), One (1) Vacuum Furnace (#F-501), Two (2) Boilers (#B-1 and B-2), Two (2) Cleaver Brooks Boilers

-- all of the above listed equipment is rated below 100 Million Btu/hr --

5. State the rule(s) or approval order condition(s) from which the applicant seeks relief.

Approval Order DAQE-004-98, Condition #21:

Condition #21 states that Inland Refining Incorporated shall only use natural gas and/or plant fuel gas as the primary fuels. They are permitted to use fuel oil only during periods of natural gas curtailment.

Due to the rising cost of natural gas, Inland would like to be able to use other fuels (fuel oil #2, fuel oil #4, fuel oil #5, fuel oil #6, and LPG) as primary fuels at their plant in Woods Cross.

6. State the specific time period(s) for which the variance is requested.

Any time during the next three months or until the Approval Order is modified to include the use of fuel oils (fuel oil #2, fuel oil #4, fuel oil #5, fuel oil #6, and LPG) as primary fuels.

7. State why compliance with the rule or approval order from which variance is sought would produce serious hardship without equal or greater benefits to the public. If financial hardship, include itemized and total costs of compliance.

Under the current Approval Order Condition #21, Inland is only allowed to use natural gas and plant fuel gas as the primary fuels. Because of the rapid price increase in natural gas, operating expenses exceed the revenue generated by sale of products from the refinery. Inland can not cover the operating losses and will have to shut down the refinery. This would result in the lay off of workers and severe financial loss to the company. The public's benefit of lower emissions from the use of natural gas is not justified based on DAQ's BACT cost policy of \$3,000/ton of pollutant. The extra cost to burn natural gas is now equal to \$10,000/ton of emissions

8. List all possible alternatives in lieu of obtaining a variance. Discuss the advantages and disadvantages of each alternative. A cost estimate for each alternative must be included.

Inland's only option in lieu of obtaining a variance is to shut the plant down.

9. State the advantages and disadvantages to nearby residents if the variance is granted.

The advantages to nearby residents would be related to helping maintain the local economy by avoiding closure of a local industry. Disadvantages would be slightly higher levels of air contaminants in the ambient air resulting from combustion of oil. However, the increase in ambient levels of SO<sub>2</sub> and NO<sub>x</sub> would remain below the levels that have already been approved in the plants approval order and the PM-10 SIP. The increase in emissions from burning oil will not increase the plant's emissions above the levels that have already been approved for the plant.

10. State how the applicant will reduce excess emissions to the maximum extent feasible during the period the variance is in effect.

All oil burning equipment will be maintained properly. The fuel oil that is used will be limited to 0.5% by weight sulfur. Fuel oil will not be used at any time that the price of natural gas drops to the equivalent price of oil.

11. State the facts showing why operations under such variance are not likely to cause a nuisance, as defined in 76-10-803, Utah Code Annotated.

Emissions of criteria pollutants will not exceed the levels that have already been approved for the plant. The HAPs emissions will decrease slightly.



15. Are other regulatory agencies or permit authorities involved with the variance request? ( ) Yes (X) No

If yes, state the agency name(s), contact person(s), phone number(s), and reasons for their involvement.

  
\_\_\_\_\_  
Signature of Responsible Person

1-19-2001  
\_\_\_\_\_  
Date

## EXCESS EMISSIONS CALCULATIONS

Business Name: Inland Refining Incorporated

The following emission information must be provided by the applicant and filed with the variance application. Include a description of the methodology used to calculate emissions.

EQUIPMENT DESCRIPTION	AIR CONTAMINANT	EMISSION LIMIT	ACTUAL EMISSIONS <sup>1</sup>	EXCESS EMISSIONS <sup>1</sup>	EXCESS EMISSIONS FOR PERIOD OF VARIANCE <sup>2</sup>
Total of All Plant Combustion Equipment	PM <sub>10</sub> (Filterable & Condensable)	4.33 lb/hr	3.01 lb/hr	0 lb/hr	0 tons
	SO <sub>x</sub>	42.6 lb/hr	21.53 lb/hr	0 lb/hr	0 tons
	NO <sub>x</sub>	46.3 lb/hr	14.23 lb/hr	0 lb/hr	0 tons
	CO	5.84 lb/hr	1.42 lb/hr	0 lb/hr	0 tons
	VOC	N/A	0.073 lb/hr	N/A	N/A
	HAPs	N/A	0.055 lb/hr	N/A	N/A
	<p>The actual emissions (in lb/hr) are calculated from the emission increase determined in the Notice of Intent. The NOI emission rates (in tons/yr) were divided by the amount of hours in a 3 month period (the length of the variance request).</p> $\text{Emissions}_{\text{lb/hr}} = (\text{Emissions}_{\text{ton/Variance request period}}) \times (2000 \text{ lbs/1 ton}) / (\text{variance request period}/2190 \text{ hrs})$				

<sup>1</sup> Express actual emissions and excess emissions in units of pounds per hour

<sup>2</sup> Express total excess emissions for period of variance in pounds per hour or tons per year



## Conversion from Natural Gas to Diesel Fuel

Calculations below assume that all natural gas boilers and engines can be converted from natural gas to diesel fuel. This is not immediately possible since only dual-fuel boilers and engines can be converted from natural gas to diesel fuel at the present time.

**Table 1: Natural Gas Consumption by Big Users**

County	Total Natural Gas Used (decatherms)	Natural Gas Consumed by Big Users (decatherms)	Percentage of Natural Gas Used By Big Users
Davis	14,728,006	6,247,917	42.4%
Salt Lake	55,440,721	18,666,305	33.7%
Utah	27,662,083	16,678,203	60.3%

Information received from Questar Gas

**Table 2: Conversion from Decatherms to mmbtu and mmcf**

County	Natural Gas Used by Big Users (decatherms)	Natural Gas Used by Big Users (mmbtu/yr)	Natural Gas Used by Big Users (mmcf/yr)
Davis	6,247,917	6,247,917	5,922
Salt Lake	18,666,305	18,666,305	17,693
Utah	16,678,203	16,678,203	16,745

1 decatherm is equal to 1mmbtu

Davis: 1 mmcf = 1055 btu, See Letter from Questar dated 2/2/00

Salt Lake: 1 mmcf = 1055 btu, See Letter from Questar dated 2/2/00

Utah: 1 mmcf = 996 btu, See Letter from Questar dated 2/2/00

**Table 3: Diesel Fuel Equivalent**

County	Natural Gas Used by Big Users (mmbtu/yr)	Diesel Fuel Used by Big Users (mmbtu/yr)	Diesel Fuel Used by Big Users (10 <sup>3</sup> gal/yr)
Davis	6,247,917	6,247,917	43,089
Salt Lake	18,666,305	18,666,305	128,733
Utah	16,678,203	16,678,203	115,022

1mmbtu natural gas = 1 mmbtu diesel fuel

145 mmbtu = 10<sup>3</sup> gal of diesel (average of residual and distillate)

**TABLE 4: Emission Factors**

Pollutant	* Natural Gas Small Boilers (lb/mmcf)	** Natural Gas Large Turbines (lb/mmbtu)	*** Diesel Fuel Boilers (lb/10 <sup>3</sup> gal)	**** Diesel Ind Engines (lb/mmbtu)
NOx	100	0.44	20	4.41
SOx	0.6	0.0006	196.5	0.29
PM10	7.6	0.0419	7	0.31
VOC	5.5	0	0.2	0.00251
CO	84	0.11	5	0.95

For the sake of simplification, only small boilers and large turbines were used for natural gas emission factors in this exercise.

These emission factors were assumed to be generally representative of the emission factors which are actually being used.

Corresponding diesel fuel emission factors were used for the same reasons.

\* AP42, 3/98, Table 1.4-1, Small Ind Boilers (<100 mmbtu/hr), Uncontrolled

\*\* AP42, 3/98, Table 3.1-1, Large Turbines, Uncontrolled

\*\*\* AP42, 3/98, Table 1.3-1, Diesel Fuel No. 4 Boilers (<100 mmbtu/hr), Uncontrolled

Assumes that the Sulfur Content of Fuel Oil No. 4 is 1.31%

\*\*\*\* AP42, 3/98, Table 3.3-1, Diesel Industrial Engines, Uncontrolled

Pollutant	Davis Small Boilers (tons/yr)	Davis Large Turbines (tons/yr)	Salt Lake Small Boilers (tons/yr)	Salt Lake Large Turbines (tons/yr)	Utah Small Boilers (tons/yr)	Utah Large Turbines (tons/yr)	Total (tons/yr)
NOx	228.27	314.91	681.98	940.82	645.44	840.61	3652.04
SOx	1.37	0.43	4.09	1.28	3.87	1.15	12.19
PM10	17.35	29.99	51.83	89.59	49.05	80.05	317.86
VOC	12.55	0.00	37.51	0.00	35.50	0.00	85.56
CO	191.75	78.73	572.87	235.20	542.17	210.15	1830.87

Assumes that 77.1% of natural gas consumption is due to small boilers and 22.9% is due to large turbines  
These percentages are extremely rough gross estimates.

**Table 6: Emissions From Diesel Fuel No. 4**

Pollutant	Davis Boilers (tons/yr)	Davis Ind. Engines (tons/yr)	Salt Lake Boilers (tons/yr)	Salt Lake Ind. Engines (tons/yr)	Utah Boilers (tons/yr)	Utah Ind. Engines (tons/yr)	Total (tons/yr)
NOx	332.17	3156.23	992.40	9429.57	886.71	8425.25	23222.34
SOx	3263.61	207.55	9750.37	620.09	8711.88	554.04	23107.53
PM10	116.26	221.87	347.34	662.85	310.35	592.25	2250.92
VOC	3.32	1.80	9.92	5.37	8.87	4.80	34.07
CO	83.04	679.91	248.10	2031.31	221.68	1814.96	5079.01

Calculations in Table 6 assume that 77.1% of natural gas consumption is due to small boilers and 22.9% is due to large turbines. These percentages are extremely rough gross estimates.

**Table 7: Comparison of Emissions**

Pollutant	Natural Gas Total (tons/yr)	Diesel Fuel Total (tons/yr)
NOx	3652.04	23222.34
SOx	12.19	23107.53
PM10	317.86	2250.92
VOC	85.56	34.07
CO	1830.87	5079.01

Diesel fuel numbers based on assumption that all natural gas engines and boilers can be converted to use diesel fuel which is not possible at the present time.

**Table 8: Actual 1999 Emissions  
Salt Lake, Davis & Utah Counties**

Pollutant	Total (tons/yr)
NOx	13047.48
SOx	8036.70
PM10	4470.20
<b>Total =</b>	<b>25554.38</b>

The emissions in Table 8 were obtained from the 1999 emission inventory.



DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR QUALITY

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**MEMORANDUM**

**TO:** Air Quality Board DAQC-025-00  
**FROM:** Richard W. Sprott, Executive Secretary  
**DATE:** December 8, 2000  
**SUBJECT:** COMPLIANCE ACTIVITIES - December 2000

Annual Inspections Conducted:

A ..... 15  
SM ..... 4  
B ..... 17

Initial Compliance Inspections Conducted:

A ..... 1  
SM ..... 1  
B ..... 2

On-Site stack test audits conducted: ..... 4  
Stack test report reviews: ..... 11

On-site CEM audits conducted: ..... 1  
Emission reports reviewed: ..... 10

Oxy fuels inspections conducted: ..... 27

\* Miscellaneous inspections conducted: ..... 17

Complaints received: ..... 25

VOC inspections:

Tankers ..... 2  
Degreasers ..... 0  
Paint Booths ..... 2

\* Miscellaneous inspections include, e.g., surveillance, level I inspections, complaints, onsite training, tanker vapor certifications, dust patrol, smoke patrol, open burning, etc.

Source Compliance Action Notice issued .....	2
Notices of Violation issued .....	6
Settlement Agreements resolved .....	7
Penalties Collected .....	\$25,722

Notices of Violations issued to:

- Kennecott Utah Copper Corporation (2)
- Inland Refining Inc
- Geneva Rock Products
- DEI Systems
- APW Zero Cases Inc

Settlement Agreements Reached:

Skywest Airlines.....	\$1,000
Huish Detergents Inc.....	\$4,000
Western Rock Products.....	\$3,200
Wasatch Constructors.....	\$2,000
Van Waters & Rogers.....	\$2,000
Monroc Inc.....	\$10,000
Pioneer Concrete of Utah.....	\$3,500



# State of Utah

## DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

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### MEMORANDUM

TO: Utah Air Quality Board DAQH-0074-01  
FROM: Richard W. Sprott, Executive Secretary  
DATE: January 22, 2001  
SUBJECT: Hazardous Air Pollutant Section Compliance Activities - December, 2000

	11/00	12/00
Asbestos Demolition/Renovation Inspections.....	13	12
Asbestos in Schools Inspections.....	3	5
MACT Compliance Inspections.....	1	5
Other NESHAP Inspections.....	0	0
State Rules (Only) Inspections.....	0	0
Asbestos Notifications Approved.....	63	72
Asbestos Phone Calls Answered.....	357	273
Asbestos Individual Certifications: Approved/Disapproved.....	20/0	42/0
Company Certifications/Re-certifications.....	3/9	0/44
Alternate Asbestos Work Practices: Approved/Disapproved.....	1/0	1/0
Lead Based Paint (LBP) Inspections.....	0	0
LBP Notifications Approved.....	0	0
LBP Phone Calls Answered.....	58	71
LBP Letters prepared and mailed.....	98	74
LBP Courses Received/Approved.....	0	2/2
LBP Course Audits.....	0	0
LBP Certifications Approved/Disapproved.....	9/2	11/0
LBP Company Certifications.....	1	13
Notices of Violation Issued.....	0	2
Notices of Noncompliance (NON).....	0	1
SCANS (warning letters) Issued.....	2	2
Settlement Agreements Finalized.....	1	1
Penalties Agreed to.....	\$46,350	\$2,000
Notice of Violation issued to: Rocky Mountain Asbestos Abatement - Asbestos Work Practices RT Manufacturing - Wood Furniture MACT		

Settlement Agreements Reached: Eagle Environmental

UTAH STATE DIVISION OF AIR QUALITY

PM2.5 Actual Concentration (24-hr average) in Micrograms per Cubic Meter  
2001 January

Date	BR	BT	BX	CW	GV	HE	HW	HG	HV	LN	LX	L4	NP	N2	OG	SF	WT	WX	WV	VX
01/01	41.7	40.6	41.7	68.5	16.9	31.2	58.2	39.0	39.9	50.2	50.9	88.0	43.8	48.6		39.5	45.8	46.4	46.8	47
01/02							42.9			51.9										
01/03							59.6			54.4										
01/04	41.6	54.5		72.1	29.0	49.5	64.6	5.3	44.7	60.8		51.4	46.8	61.1		32.6	38.7		62.9	
01/05							66.2			62.5										
01/06							54.5			74.1										
01/07	37.6	39.6	39.9	53.3	22.5	33.1	47.7	49.7	36.9	65.5		38.1	49.1	46.2		43.1	35.5	35.2	46.6	46
01/08							57.5			44.5										
01/09							62.4													
01/10	38.7	35.3		48.0	28.5	2.9	46.4	53.7	36.2	6.3		70.9	8.8	43.1		8.3	30.2		43.0	
01/11							6.4			6.8										
01/12							9.9			10.7										
01/13	6.0	6.1	6.2	10.2	3.7	7.5	9.2		10.3	10.5	10.3	22.1	10.8	7.7		6.5	7.3	7.6	10.4	10
01/14							12.8			6.9										
01/15							8.7			13.8										
01/16	4.9	3.7		11.7	7.5	7.2	4.4		3.6	12.6		24.5	10.7	12.7		8.1	3.9			
01/17							15.5			18.0										
01/18							23.5			29.7										
01/19	35.2	35.0	35.8	35.2	17.9	21.0	32.7	30.1	31.3	31.7	30.7	61.6	29.9	37.7		26.1	32.6	32.9	30.1	
01/20							33.0			32.7										
01/21							30.4			19.6										
01/22	24.4	33.7		45.5	32.6	35.8	42.6		24.8	40.6		50.8	39.5			39.1	22.0	35.7		
01/23							51.2			36.5										
01/24							22.0			17.8										
01/25	7.1			9.1	2.6	4.1	8.5			8.3	7.9	34.9	7.2	9.7		4.7			9.5	
01/26							5.6			14.1										
01/27							4.2			13.3										
01/28	10.0			13.7	7.1	7.7	10.1			25.3		31.7	20.6	10.1		17.8			12.3	
01/29							18.6													
01/30																				
01/31																				

Arith Mean	24.7	31.1	30.9	36.7	16.8	21.0	31.4	35.6	28.5	30.4	25.0	47.4	26.7	31.3		22.6	27.0	31.5	32.7	34
Max 24-hr Avg	41.7	54.5	41.7	72.1	32.6	49.5	66.2	53.7	44.7	74.1	50.9	88.0	49.1	61.1		43.1	45.8	46.4	62.9	47
Std. Dev	16.0	17.4	16.6	24.4	11.2	15.6	21.8	19.3	14.6	20.6	20.1	21.3	17.0	19.5		15.3	14.9	14.4	20.3	20
Days of Data	10	8	4	10	10	10	29	5	8	28	4	10	10	10		10	8	5	8	3
Yearly Mean	12.4	11.5	11.4	15.1	9.0	12.3	15.9	10.2	18.0	13.0	11.8	14.7	12.5	16.7		9.9	10.1	11.3	14.9	14

# UTAH STATE DIVISION OF AIR QUALITY

47mm Partisol: PM10 Concentration Adjusted to Sea Level (24-hr average) in Micrograms per Cubic Meter

2001 January

Date	Cottonwood	Hawthorn	Lindon	Logan 4	Magna(W)	Moab	NProvo	NProvo-X	NSL	NSL-X	Ogden
01/01	76	79	71	106	38	40	59	60	59	59	
01/02		65	77						62		
01/03		90	87		60				86		
01/04	91	101	89	60					81		
01/05		105	86						85		
01/06		80	100						63		
01/07	63	68	87	44	42	29			60	61	
01/08		91	73				61	60	74		
01/09		100	72						98		
01/10	61	63	10	63					60		
01/11		21	15						45		
01/12			18						16		
01/13	16	17	16	23	8	18	16	17	19	19	
01/14		20	7						20		
01/15		14	21						22		
01/16	19	10	27	38	11		19		37		
01/17		28	32						29		
01/18		40	46						49		
01/19	55	56	59	86	35		48	49		73	
01/20		48	47						47		
01/21			36								
01/22	62	64	79	73	46		68		55		
01/23		86	76						77		
01/24		51	37						77		
01/25	12	10		42	8		8	9	16	17	
01/26			31						40		
01/27		9	29						24		
01/28	23	17	32	41	12		24		21		
01/29		35							61		
01/30									25		
01/31											
<hr/>											
Arith Mean	48	53	50	58	29	29	38	39	50	46	
Max 24-hr Avg	91	105	100	106	60	40	68	60	98	73	
Std. Dev	28	32	29	25	19	11	23	24	25	26	
Days of Data	10	26	27	10	9	3	8	5	28	5	
Days >150											
Yearly Avg	32	33	37	30	26	21	29	31	49	48	

# STATUS OF STATE IMPLEMENTATION PLANS, MAINTENANCE PLANS, REDESIGNATION REQUESTS, AND RULES CHANGES

February 7, 2001

Changes from previous month are *in bold/italics*.

SUBJECT	AREA	ATTAINMENT STATUS	ITEM	Progress		
				DAQ in progress	Submit to EPA	EPA Approve Date
Ozone	Salt Lake and Davis County Maintenance Area	Attainment.	Revoke 1-hour standard			June 5, 1998
			Reinstate 1-hour standard			<u>Fed Reg</u> Jul 20,00; eff Oct 18, 00
			Maintenance plan and redesignation request, originally submitted Nov 12, 1993, with revisions and resubmittals on July 28, 1994, Jan 13, 1995, July 17, 1995, Oct 2, 1995, June 18, 1996, and March 1, 1996		Feb 21, 97	July 18, 1997 Eff. Aug 18, 1997
			Inventory rule, R307-1-3.5	Complete		
			NOx, VOC RACT provisions added to plan, rules.		Jun 28, 94	Partial Approval July 18, 97 Eff. Aug 18, 1997
			<i>Inventory and monitored data to be submitted to demonstrate attainment date by Dec 31, 01.</i>			
			Road salting and contingency measures update	Complete	Feb 3, 95	State withdrew the submittal Nov 98
			Update SIP and emission limits	Complete	Jul 11, 96	
			Update contingency measures		Oct 6, 94	State withdrew the submittal Nov 98
			Non-attainment: moderate	Non-attainment: moderate	Complete	June 2, 97
Other Areas	Attainment	Complete	Feb 3, 95			
Grant Extension of Attain Dates for SL, Utah Co		Extensions requested	May 11, 95; Mar 27, 96	Published <u>Fed Reg</u> Sept 21, 00 for public comment		

\* If no date is noted, no action has been taken



SUBJECT	AREA	ATTAINMENT STATUS	ITEM	ACTION								
				DAQ in progress	Submit to EPA	EPA Approve Date						
Sulfur dioxide	Salt Lake, east Tooele County	Non attainment	Maintenance plan and redesignation request	<i>Support modeling in progress</i>								
			Maintenance plan and redesignation request				Jan 13, 97	<i>Signed Oct, 2000, not yet published</i>				
			Maintenance plan and redesignation request									
	Ogden City	Non-attainment	Maintenance plan and redesignation request		Jan 13, 97	<i>Signed Oct, 2000, not yet published</i>						
			Maintenance plan and redesignation request									
	Salt Lake City	Attainment	Maintenance plan and redesignation request		Dec 16, 96	Fed Reg January 21, 1999. Effective March 22, 1999						
			Delete oxyfuel requirement				<i>Signed Oct, 2000, not yet published</i>					
	Salt Lake and Davis County		Delete oxyfuel requirement	Complete	Aug 16, 96	<i>Signed Oct, 2000, not yet published</i>						
			Add oxyfuel and trip reduction program as a contingency measure									
	Carbon monoxide	Weber County (Contains Non-Attainment Area)		Require 3.1% oxygen content in gasoline		Jan 14, 97						
Revise Basic IM plan (Fed Highway Act submittal on Mar 25, 1996). Documentation submitted to EPA on May 27, 1999. Letter of July 26, 1999 expressed intent to approve.				<i>Re-write SIP to match current Utah Co program</i>								
Revise IM program								Complete	Oct 18, 95			
SIP revision, revise oxyfuel program, add woodburning restrictions											Jul 13, 94	
Revise oxyfuel rule to reflect 1st year experience												
Revise oxyfuel rules and SIP to clarify triggering provisions	June 10, 98	<i>Signed Oct, 2000, not yet published</i>										

\* If no date is noted, no action has been taken

SUBJECT	AREA	ATTAINMENT STATUS	ITEM	DAQ in Progress		
				Submit to EPA	EPA Approve Date	
All criteria pollutants	Statewide		Streamline permit process for small sources	Complete	Oct 9, 98	
			Correct small source permit rule	Effective Sept 2, 97	Oct 9, 98	
			Incorporate New Source Performance Standards by reference		Dec 3, 96	Fed Reg May 7, eff July 7, 1997
			Amend dispersion modeling rule for criteria pollutants		Dec 3, 96	
			Reduce inventory reporting requirements for small sources		Sept 9, 96	
			Break up R307-1.4 into 4 additional rules	Complete	Feb 16, 96	
			Expand R307-2 to create one section for each major SIP component.		Feb 16, 96	
			Cleanup required by Legislature		Jan 30, 95	
			Renumbering SIP components		June 28, 94	
			Revise used oil exemption		Feb 5, 97	
			Revise inventory rule to require submittal every 3rd year for large sources, small sources every 6th year	Effective Feb 5, 98	July 9, 98	
			Add park and ride lots to Utah County Transportation Control Measures	Eff Feb 10, 2000		Fed Reg June 14, 2000, effective Aug 14, 2000
			Visibility	Statewide		SIP review due
Regional Haze	Statewide		Final rule published Jul 1, 99. Annex submitted Oct 1, 2000; SIP due Dec 31, 2003.			
General Conformity	All nonattainment areas		Incorporate by reference federal requirements	Complete	Oct 12, 1995	Fed Reg Nov 19, 99; effective 1-18-00.

SUBJECT	AREA	ATTAINMENT STATUS	ITEM			
				DAQ in progress	Submit to EPA	EPA Approve Date
Transportation Conformity	All nonattainment areas		Third Round of Amendments Finalized by EPA - must be incorporated into draft rules by State, adopted by the AQB, and submitted to EPA. Sanction Clock will be forthcoming for non-submittal.	Retracted		