



State of Utah

GARY R. HERBERT
Governor

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Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF AIR QUALITY

Bryce C. Bird
Director

DAQP-097-19

June 18, 2019

Douglas Benevento
Regional Administrator
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

RE: Data Requirements Rule: 2018 SO₂ Emissions Annual Report

Mr. Benevento:

§51.1205(b) of the Data Requirements Rule (DRR) for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS) requires air agencies to submit an annual report that documents the annual SO₂ emissions of each applicable source to the EPA Regional Administrator by July 1 of each year, beginning with the calendar year after the effective date of the area's initial designation. Utah has three DRR sources in two counties as shown in the table below.

DRR Source	County	Modeling Years			2015	2016	2017	2018	% change from highest modeling year to 2018
		2012	2013	2014					
Hunter Power Plant	Emery	4,533.0	5,055.0	3,939.0	4,238.2	3,197.3	3,511.6	3,133.3	-38.0%
Huntington Power Plant	Emery	2,301.0	2,411.0	2,479.0	2,523.9	2,364.3	2,281.8	2,202.2	-11.2%
Intermountain Power Plant	Millard	3,553.0	4,727.0	4,372.0	3,768.3	2,784.9	2,483.6	2,484.7	-47.4%

Both counties were designated "attainment/unclassifiable" on January 9, 2018, using the modeling approach outlined in the DRR based upon actual emissions data from 2012 through 2014 from each DRR source. For each of the three DRR sources, the table shows the 2012-2014 emissions data used in the Utah Division of Air Quality (UDAQ) modeling analysis as well as subsequent annual emissions data for 2015 through 2018.

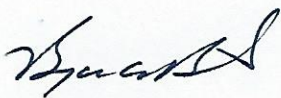
As can be seen, SO₂ emissions for the most recent data year (2018) were lower than the highest modeling year emissions level for each source. Specifically, 2018 emissions were lower than 2013 emissions by 38.0% for the Hunter Power Plant. Similarly, 2018 emissions were lower than

2014 emissions by 11.2% for the Huntington Power Plant. Finally, 2018 emissions were lower than 2013 emissions by 47.4% for the Intermountain Power Plant.

Under §51.1205(b)(1), air agencies are required to include a recommendation in their annual report regarding whether additional modeling is needed to characterize air quality in areas with DRR sources. Because emissions levels have decreased compared to the modeling years 2012-2014, UDAQ recommends that no additional modeling is needed at this time to further characterize air quality in the areas surrounding Utah's DRR facilities.

As per §51.1205(b), this assessment will be posted on UDAQ's website for a period of 30 days for public inspection. If you have any questions or need additional information regarding this submittal, please contact Glade Sowards at 801-536-4020 or gladesowards@utah.gov.

Sincerely,



Bryce C. Bird
Director

BCB:GS:jf



Department of
Environmental Quality

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

State of Utah

DARYL HERR
GOVERNOR
PROJECTS
LEGISLATIVE COUNCIL

Douglas Bennett
Regional Administrator
U.S. Environmental Protection Agency, Region 8
1525 W. York Street
Denver, Colorado 80202

RI: Data Requirements Rule: 2018 SO₂ Emissions Annual Report

Mr. Bennett:

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DRR Source	County	Modeling Years		2018	2017	2018	% change from highest modeling year to 2018
		2012	2014				
Hunter Power Plant	Emery	1,100	1,100	1,100	1,100	1,100	-38.0%
Huntington Power Plant	Emery	2,300	2,300	2,300	2,300	2,300	-11.3%
Intermountain Power Plant	Mildred	1,000	1,000	1,000	1,000	1,000	-47.4%

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As can be seen, SO₂ emissions for the most recent data year (2018) were lower than the highest modeling year emissions level for each source. Specifically, 2018 emissions were lower than 2013 emissions by 38.0% for the Hunter Power Plant. Similarly, 2018 emissions were lower than