



PROTECTING THE WEST'S LAND, AIR, AND WATER

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

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DIVISION OF AIR QUALITY

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Re: Comments on UPA 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

Dear Mr. Bird, Mr. Reiss and Mr. Gunter,

Thank you for this opportunity to comment on the Utah Petroleum Association (UPA) 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 (UPA Comments). I make these comments on behalf of HEAL Utah, Utah Physicians for a Healthy Environment, the Utah Chapter of the Sierra Club and Western Resource Advocates. The UPA Comments report on a "Precursor Demonstration" performed at the behest of the trade organization that purports to show that emissions of PM_{2.5} precursors (NO_x, SO₂, VOCs and ammonia) from major sources do not significantly contribute to PM_{2.5} levels that exceed the 24-hour fine particulate National Ambient Air Quality Standard (NAAQS) in the Salt Lake City Nonattainment Area (Salt Lake NAA).

To make its case, UPA relies heavily on the April 2018 Technical Basis Document,¹ a document the Environmental Protection Agency (EPA) specifically maintains applies only to Section 165(a)(3) of the Clean Air Act, 42 U.S.C. 7475(a)(3) (Preconstruction Requirements), and **"no other parts of the Clean Air Act,"** 2018 Technical Basis Document at 6, fn. 5, and which does not address precursor demonstrations in any way. UPA latches on to the 2018 Technical Basis Document to contend that a threshold concentration of 1.5 µg/m³ represents an air quality change that is "significant" and thus that "contributes" to PM_{2.5} concentrations subject to the NAAQS. UPA then tiers the 2018 Technical Basis Document to **draft EPA guidance** that "recommends" as guideline, a threshold of 1.3 µg/m³ as representing a significant contribution as maintained in a 2016 Technical Basis document. Draft PM_{2.5} Precursor Demonstration Guidance, November 17, 2016 (Draft Guidance) at 15-16; *see* UPA Comments on Subpart H at 9, fn. 31.

¹ Technical Basis for the EPA's Development of the Significant Impact Thresholds for PM_{2.5} and Ozone (2018 Technical Basis Document).

UPA maintains that because its modeling shows that precursor emissions from major sources in the Salt Lake NAA contribute less than 1.5 $\mu\text{g}/\text{m}^3$ of $\text{PM}_{2.5}$ to ambient concentrations of $\text{PM}_{2.5}$ during inversions, emissions of $\text{PM}_{2.5}$ precursors from these sources should not be further controlled, i.e. should not be subject to best available control technology as part of the Serious $\text{PM}_{2.5}$ State Implementation Plan (Serious SIP) for the Salt Lake NAA. For several reasons enumerated below, UPA is mistaken.

Initially, while we appreciate the opportunity to provide feedback on the UPA Comments, we note that the trade organization's submission is in no way either a "rule or plan change open for public comment" as your webpage suggests.² Moreover, as there is no proposed action associated with the UPA Comments, it is unclear exactly what is being put forward, if anything, relative to the trade organization's submission and how the public is to comment on a document that does not represent proposed government action, analysis or notice. That said, we offer our analysis of the UPA Comments below.

I. Commenting Organizations

HEAL Utah promotes clean air and renewable energy, and protects public health and the environment from nuclear and other toxic threats. Representing more than 20,000 members, HEAL has a long track record of achieving positive change in the state by mobilizing local communities, promoting science-based public policy and legislation, and strategically working with regulatory agencies.

The Utah Chapter of the Sierra Club works to protect Utah's wild places, wildlife, and waters, as well as the people and communities who depend on them. Our activism and advocacy are based on our strong grassroots networks, citizen-based leadership, and the guidance and skillsets of professional staff support. With over 5,600 members, and growing, we work to protect public lands, promote renewable energy, and support initiatives that promote clean air strategies. We maintain a presence at the Utah Legislature to advocate on the full spectrum of environmental issues and amplify the voices of our members.

Utah Physicians for a Healthy Environment is the largest community service organization of health professionals in the state of Utah. The organization and its members are health professionals, toxicologists, biologists, chemists and engineers dedicated to protecting the health and well-being of the citizens of Utah.

Western Resource Advocates is a regional non-profit conservation organization headquartered in Boulder, Colorado with programs and staff spanning the intermountain west, including Utah. Our mission is to protect the land, air and water of our region, using law, science, economics,

² <https://deq.utah.gov/air-quality/air-quality-rule-plan-changes-open-public-comment>

advocacy, education, and action. To this end, we work to curb climate change and achieve environmentally sustainable management of energy, land, and water resources.

The organizations' interest in the present matter is based on the public health crisis that exists as a result of severe and frequent spikes in PM_{2.5} air pollution that occur in northern Utah. These acute, and often long-lasting episodes of high concentrations of PM_{2.5} jeopardize the well-being of northern Utah's residents.

II. Analysis of the UPA Submission

For the several reasons enumerated here, UPA is mistaken when it argues that, based on the trade organization's precursor demonstration, the Air Quality Board should exempt PM_{2.5} precursors from major sources in the Salt Lake NAA from further controls and therefore from the application of best available control technology.

Only an Air Agency May Submit a Precursor Demonstration.

Initially, UPA's purported precursor demonstration is not a valid precursor demonstration on which state or federal decision making can be based and should not be treated as such. As EPA made clear, only an "air agency" may submit a precursor demonstration. 81 Fed.Reg. 58010, 58017 (Aug. 24, 2016) Moreover, EPA will only accept a precursor demonstration from an "air agency" after the public has been given notice of and the opportunity to comment on the precursor demonstration actually authored by an air agency:

The EPA believes these are sound procedural steps for a state rulemaking process, and the final rule includes similar language requiring public review of any proposed precursor demonstration.

Id. at 58024. Therefore, it would be improper for the Air Quality Board to take any action or make any decision based on a precursor demonstration that has **not** been authored by, in our case, the Utah Division of Air Quality (Division) and where the public has **not** been given notice of and opportunity to comment on the agency's modeling, analysis and report. Any action or decision based on the UPA precursor demonstration would necessarily be premature and could potentially bias subsequent action by the Board.

UPA's Conclusions Are Based on a Threshold that Does Not Apply to Precursor Demonstrations and on Draft, Generalized Guidelines that are Not Specific to the Salt Lake NAA.

EPA will approve a state-submitted, publicly-reviewed precursor demonstration only if the state can overcome the presumption a state must regulate all precursors emissions, regardless of the source, as part of an attainment demonstration. For example, in explaining *NRDC v. EPA*, the case deciding the matter, EPA stated:

The court's decision made clear that appropriate regulation of all precursors in designated nonattainment areas is presumptively required under the [Clean Air Act], and the regulation of precursors in general is a critical issue for attainment of the PM_{2.5} NAAQS because secondarily formed particles are a substantial component of PM_{2.5} concentrations in most nonattainment areas of the United States.

81 Fed. Reg. at 58019. This presumption is particularly relevant to the Salt Lake NAA where “[t]he majority of ambient PM_{2.5} collected during a typical cold-pool episode of elevated concentration is secondary particulate matter, born of gaseous precursor emissions. PM_{2.5} precursors include sulfur dioxide (SO₂), oxides of nitrogen (NO_x), volatile organic compounds (VOC), and ammonia (NH₃).” Draft Control Measures for Area and Point Sources, Fine Particulate Matter, Serious Area PM_{2.5} SIP for the Salt Lake City, Utah Nonattainment Area, Section IX, Part A.31 (Draft Serious SIP) at 13. Indeed, acknowledging this fact, the Division specifically decided **not** to work with EPA on any precursor demonstration and **not** to submit any such demonstration to the Air Quality Board or the public. *Id.*

To overcome this heavy presumption relative to major sources in the Salt Lake NAA, Utah would have to show that precursor emissions from all relevant major sources do not “contribute significantly to PM_{2.5} levels” in the Salt Lake NAA. 81 Fed. Reg. at 58020. UPA contends that its modeling is sufficient to second guess the Division’s longstanding position that additional reductions of precursor emissions from major sources are appropriate as part of Utah’s overall efforts to attain the NAAQS in the Salt Lake NAA.

As explained above, UPA relies exclusively on a threshold concentration of 1.5 µg/m³ to contend that precursor emissions from Salt Lake NAA major sources do not “significantly” contribute to PM_{2.5} concentrations in the NAA. This concentration comes from an April 2018 Technical Basis Document that EPA specifically maintains applies only to Section 165(a)(3) of the Clean Air Act, 42 U.S.C. 7475(a)(3) (Preconstruction Requirements), and “**no other parts of the Clean Air Act,**” 2018 Technical Basis Document at 6, fn. 5, and which does not address precursor demonstrations in any way. UPA’s dependence on this threshold to make its case is unconvincing and is insufficient to overcome the Division’s longstanding approach and the presumption of regulation.

First, contrary to UPA’s assertions, there is no threshold for establishing what constitutes a “significant contribution.” Indeed, EPA specifically refused to set a bright line threshold for a significant contribution, 81 Fed. Reg. at 58022-23, and instead indicated that it would provide only guidance and recommendations for establishing non-significance:

EPA has decided that the best approach is for the final rule to codify the availability and basic requirements for precursor demonstrations, but to provide technical details (such as a recommended approach for assessing whether a particular air quality concentration threshold can be considered to be insignificant in a given area) in guidance supporting this final rule.

Id. at 58023. The agency reached this conclusion exactly because “EPA understands that PM_{2.5} nonattainment problems are complex and vary greatly based on the facts and circumstances of each area.” *Id.*

Moreover, in providing a draft of those “technical details” in its 2016 Draft Guidance, EPA again underscored that its draft guidance is just that – guidance, reflecting merely guidelines and recommendations. Draft Guidance at 7-8. Further, EPA noted that the draft “guidance” may not even be applicable to the particularities of a particular nonattainment area:

Thus, [the Draft Guidance] does not impose binding, enforceable requirements on any party, nor does it assure that the EPA will approve a precursor demonstrations in all instances where the guidance is followed, as the guidance may not apply to a particular situation based upon the circumstances of a particular nonattainment area.

EPA Draft Guidance at 7-8. EPA’s draft guidance is also “draft” – meaning that the agency has yet to respond to the public comment submitted in response to the draft. With all these caveats, EPA recommends a draft guideline threshold for gauging a significant contribution of 1.3 µg/m³. Draft Guidance at 15-16.

Thus, UPA’s claim that major source precursor emissions do not contribute significantly is wholly dependent on a threshold concentration, despite that it fails to address the particular circumstances of the Salt Lake NAA, that EPA has rejected the notion of any bright line threshold, and that it is based on the 2018 Technical Basis Document that is not relevant to precursor demonstrations and EPA **draft** guidance that the agency refers to as recommendations and guidelines. As further below, a contention based on such shaky ground is not sufficient to overcome the presumption that precursors will be regulated and the Division’s longstanding approach that reductions of precursor emissions, including those from major sources, is a critical component of a plan to attain the PM_{2.5} NAAQS in the Salt Lake NAA.

UPA is Wrong to Suggest that its Modeling Exercise Compels any Particular Action.

UPA contends that its modeling “demonstrates that precursors [emitted by major sources] make an insignificant contribution to PM_{2.5} levels in the SLC NAA.” *Id.* at 17. The trade organization further insists that its modeling compels the Air Quality Board to “exercise its judgment to consider the necessity” of imposing BACT on major sources in the Salt Lake NAA. UPA Comments at 14. UPA ultimately claims “it is simply not correct for UDAQ to represent to the Board that BACT must be imposed for all precursor emissions regardless of whether the modeling shows such controls to be necessary.” *Id.* at 16.³ UPA is mistaken in making each of these claims.

³ We agree with UPA that the Air Quality Board (and the Division) must “evaluate” the UPA submission, UPA Comments at 16, just as the Air Quality Board and the Division must evaluate and consider all the comments submitted by the public, including HEAL Utah, Utah Chapter of the Sierra Club and Western Resources Advocates.

First, as explained above, UPA is wrong to suggest that its modeling “demonstrates” a non-significant contribution. This is because EPA specifically refused to establish a bright line threshold. 81 Fed. Reg. at 58022-23. The agency stated further that following its draft guidance and the 1.3 $\mu\text{g}/\text{m}^3$ threshold guideline, does not “assure that the EPA will approve a precursor demonstrations in all instances where the guidance is followed, as the guidance may not apply to a particular situation based upon the circumstances of a particular nonattainment area.” Draft Guidance at 8; *see also id.* at 7 (EPA explaining that the draft guidance “will be **useful** to air agencies in developing the precursor demonstrations by which the EPA can ultimately determine whether sources of a particular precursor contribute significantly to $\text{PM}_{2.5}$ levels that exceed the standard in a particular nonattainment area.”)(emphasis added). Thus, UPA’s modeling can do nothing more than **purport to estimate** the contribution that precursor emissions from major sources have on the Salt Lake NAA, it does **not** establish that these contributions are insignificant.⁴

Second, in large part because the UPA modeling serves only to estimate contributions, the modeling does not compel either the Air Quality Board or the Division to do anything other than consider what the trade group has put forward. The Air Quality Board has, on the one hand, the estimate of major source precursor emission contributions and on the other the Division’s determination that precursors play a dominant role in violations of the $\text{PM}_{2.5}$ NAAQS, decision **not** to submit a precursor demonstration and determination that reductions in precursor emissions, regardless of the source, lead to meaningful reductions in levels of $\text{PM}_{2.5}$ during inversion episodes. As the Division explains:

Past trends in emissions reductions, particularly reductions in NO_x and SO_2 , compare favorably with commensurate trends in monitored $\text{PM}_{2.5}$. Against a more-or-less constant background of direct $\text{PM}_{2.5}$ emissions, these trends suggest that the area has experienced large improvements in the magnitude of $\text{PM}_{2.5}$ exceedances incurred during wintertime episodes of cold pool meteorology. These episodes are dominated by secondary $\text{PM}_{2.5}$.

Draft Control Measures for Area and Point Sources, Fine Particulate Matter, Serious Area $\text{PM}_{2.5}$ SIP for the Salt Lake City, Utah Nonattainment Area, Section IX, Part A.31 (Draft Serious SIP) at 73. Therefore, while the Board and the Division are compelled to consider the UPA submission, they are not compelled to be convinced by it. Moreover, the Air Quality Board is free to conclude that the Division, not UPA, has it right.

Third, contrary to UPA’s claim otherwise, the Division has the discretion to represent to the Air Quality Board, as it has done in the Draft Serious SIP, that BACT must be imposed for all precursor emissions even though UPA’s modeling estimates the contribution of major source precursor emissions to $\text{PM}_{2.5}$ concentrations in the Salt Lake NAA to be insignificant. As explained above, UPA has not shown and cannot show that BACT controls are not necessary. Rather, UPA has estimated precursor contribution. The Division has determined that BACT

⁴ We in no way suggest that UPA’s modeling efforts are convincing. We have not been provided with sufficient data, information or time to determine whether the modeling itself is accurate.

controls are necessary, a decision that is completely in line with the Clean Air Act's presumption that appropriate regulation of all precursors in designated nonattainment areas is presumptively required. Therefore, even in light of the UPA modeling and consistent with the Division's repeated position that regulating precursors from major sources is a critical part of Utah's strategy for attaining the NAAQS, the appropriate course of action for the Air Quality Board is to ensure that the Division imposes BACT on the Salt Lake NAA major sources.

The UPA Submission Conflicts with the Proposed Salt Lake NAA Serious SIP.

The conclusions UPA tries to draw from its modeling effort conflict directly with the Draft Serious SIP and the Division's steadfast position that regulating precursor emissions, including those from major sources, has led and will lead to decreases in PM_{2.5} concentrations in the Salt Lake NAA. First, acknowledging that wintertime inversion episodes are "dominated by secondary PM_{2.5}," Draft Serious SIP at 73, the Division applied reasonably available control technology requirements to reduce precursor emissions from the major sources of the Salt Lake NAA in the Moderate SIP. Draft Serious SIP at 29. Likewise, more recently the Division proposed to the Air Quality Board BACT requirements to reduce precursor emissions from the major sources of the Salt Lake NAA as part of Serious SIP. *Id.* The Division also specifically declined to draft or submit a precursor demonstration to the Air Quality Board as part of either the Moderate or the Serious SIP. *Id.*

Thus, UPA's contention that precursor emissions from major sources should not be controlled and that a precursor demonstration is appropriate for the Salt Lake NAA conflicts with longstanding and recent findings made by the Division. As established above, because the Division's position on precursor emissions from major sources is consistent with the presumption that precursors from all sources should be regulated, the agency's position is appropriate.

Further, the Division's position on precursors is based on long term monitoring data showing that there has been and will be reductions in precursor emissions that result in improvements to air quality in the Salt Lake NAA. Draft Serious SIP at 73. Thus, although direct PM_{2.5} emissions have held steady, reductions in precursor emissions have led to "large improvements in the magnitude of PM_{2.5} exceedances." As the Division explained fully:

Past trends in emissions reductions, particularly reductions in NO_x and SO₂, compare favorably with commensurate trends in monitored PM_{2.5}. Against a more-or-less constant background of direct PM_{2.5} emissions, these trends suggest that the area has experienced large improvements in the magnitude of PM_{2.5} exceedances incurred during wintertime episodes of cold pool meteorology. These episodes are dominated by secondary PM_{2.5}.

Id.

Finally, the Division has, as part of the Serious SIP, specifically asserted that the same model on which UPA based its comments tends to underestimate the improvements in PM_{2.5}

concentrations achieved by reducing precursor emissions. As a result, UPA's assertion that the model can accurately predict precursor contributions again conflicts with the Draft Serious SIP.

In the Draft Serious SIP, the Division was unable to model attainment in the Salt Lake NAA by 2019. Draft Serious SIP at 50. However, confident that the Salt Lake NAA would indeed attain by 2019, the Division explained that its model – the same model used by UPA – was uncertain and in many instances underestimated the full extent of the air quality benefits that would result from the reductions in precursor emissions set forth in the SIP. For example, the Division stated:

- “The Salt Lake City nonattainment area has such a high proportion of secondary chemistry at the heart of its PM_{2.5} problem that any uncertainties associated with the photochemistry will certainly become more prominent than for nonattainment areas that are less complex.” Draft Serious SIP at 52.
- “This apparent underestimation in chloride and HCl emissions adds uncertainty to the modeling results. By not accounting for these emissions and their impact on PM_{2.5} formation through the availability of various oxidants, the model's sensitivity to NO_x controls may be limited. The model is likely creating an oxidant-limited regime, and may therefore be less responsive to simulated NO_x controls.” *Id.* at 53.
- [Regarding a missing nitryl chloride chemistry pathway in CAMx] “Without this pathway, the model may be less responsive to proposed NO_x controls.” *Id.* at 58
- “This implies that if the model more accurately represented the wintertime inversion episode, then one would certainly see a bigger PM_{2.5} decrease relative to the sizable reduction in NO_x and VOC emissions projected for 2019.” *Id.* at 73.
- “[T]he atmosphere itself must be approximated and is certainly more complex than the model can describe.” *Id.* at 52.
- “Furthermore, and in a synergistic way, our advances in the understanding of the various photochemical pathways to PM_{2.5} also serve to underscore the aforementioned uncertainties in the emissions inventory.” *Id.*
- “There are many uncertainties surrounding the origins and distribution of ammonia emissions.” *Id.* at 53.
- “CAMx was not able to re-create the observed concentrations of ammonium nitrate.” *Id.* at 55.
- “The CAMx model does not currently account for the re-volatilization of ammonia.” *Id.*

- “[F]ully 40% of the emission inventory was artificially introduced into the SLC nonattainment area.” *Id.* at 56.
- “The effect of holding the amount of injected ammonia constant potentially makes the model stiff and unresponsive to modeled reductions in NO_x emissions.” *Id.* at 57.
- “Both modeled ozone and nitrate (Figure 6.12) increased after increasing formaldehyde emissions, suggesting that the model is oxidant-limited and may have a limited sensitivity to a reduction in NO_x emissions. An underestimation of formaldehyde will lead to an underestimation in the production of HNO₃, leading to a reduced response to proposed NO_x controls.” *Id.* at 60.

Thus, the Division maintains that the model that UPA used to estimate the contribution of major source precursor emission to PM_{2.5} concentrations in the Salt Lake NAA is uncertain and tends to underestimate the air quality benefits of reductions in particularly NO_x. Based on this critique, it would be highly inappropriate to base a precursor demonstration on this model.

Further, the Division asserts that there is a direct relationship between reduced precursor emissions, as evidenced reductions in ambient concentrations of NO_x and SO₂, Draft Serious SIP at 63-64, and reductions in emissions of NO_x, SO₂ and VOCs based on emissions inventories, *id.* at 65, and reductions in concentrations of PM_{2.5}. *Id.* at 61-62. The Division concludes:

- “Past trends in emissions reductions, particularly reductions in NO_x and SO₂, compare favorably with commensurate trends in monitored PM_{2.5}. Against a more-or-less constant background of direct PM_{2.5} emissions, these trends suggest that the area has experienced large improvements in the magnitude of PM_{2.5} exceedances incurred during wintertime episodes of cold pool meteorology. These episodes are dominated by secondary PM_{2.5}.” *Id.* at 73.
- “Taken together, this would suggest that the persistent decline in NO_x and VOC emissions is most directly responsible for the commensurate improvement in PM_{2.5} concentrations, particularly with respect to the secondary PM_{2.5} that dominates the highest exceedances.” *Id.* at 65.

Thus, UPA’s contention conflicts with the Draft Serious SIP on several levels. It is contrary to the Division’s position articulated in their Draft Serious SIP that a precursor demonstration is not appropriate, that precursor emissions from major sources must be subject to BACT, that the model is uncertain and underestimates air quality benefits from reductions in precursors, that reductions in precursors do lead to marked reductions in PM_{2.5} concentrations, and that the appropriate strategy for the Salt Lake NAA area is to further reduce precursor emissions, including from major sources in order to attain the PM_{2.5} NAAQS. Because UPA’s prediction of precursor contribution has no persuasive power in light of the Division’s findings and analysis, it should be rejected.

A Division Precursor Demonstration Would Conflict With and Require a Revamping of the Salt Lake NAA Serious SIP.

If, despite the analysis here and similar arguments already made by the Division, the Air Quality Board were to order Division to submit a precursor demonstration or if the Division were to change its position and propose submitting such a demonstration, the Draft Serious SIP and Subpart H would have to be completely revamped. As established above, any precursor demonstration that sought to exempt major source precursor emissions from BACT would conflict significantly with what the Division has stated throughout the SIP drafting process, the BACT review process, and now the Draft Serious SIP. Therefore, a precursor demonstration could not be submitted to EPA unless the Serious SIP and BACT review were radically rewritten and the public given the opportunity to comment on this fundamental change in the Utah's strategy for bringing the Salt Lake NAA into compliance with the PM_{2.5} NAAQS.⁵

A Division Precursor Demonstration Could Not Withstand Review.

For the same reasons cited above, a precursor demonstration would not withstand review. As established above, throughout the SIP process, including BACT review, and as reiterated in the Draft SIP and in preliminary responses to the UPA modeling, the Division has consistently maintained a position that is antithetical to that put forward by UPA and that would conflict directly with any decision to submit a precursor demonstration for major sources in the Salt Lake NAA to EPA. For the Division to suddenly flip its position relative to these determinations and to contend that its uncertain model could show that precursors from major sources do not significantly contribute to PM_{2.5} concentrations would necessarily be arbitrary and capricious and could not withstand scrutiny.

UPA Modeling Fails to Reflect the Aggregate Impact of Precursor Emissions from Major Sources in the Salt Lake NAA.

Finally, the UPA prediction of precursor contributions fails to reflect the aggregate impact of precursor emissions from Salt Lake NAA major sources. In other words, emissions of NO_x, SO₂, VOCs and ammonia from major sources may, and are likely to, synergistically impact concentrations of PM_{2.5} in the Salt Lake NAA. Therefore, because UPA appears to have dealt with these emissions singly, the trade organization's modeling may well underestimate the contribution major source precursor emissions make. Certainly, given that there is a strong presumption that precursors must be subject to regulation, UPA's modeling in its current form fails to establish the basis for a precursor demonstration.

⁵ In addition to its lengthy review of the uncertainty and underreporting of the CAMx model, the Draft Serious SIP is replete with references to and reliance on reductions in precursor emission from major sources. For example, the SIP's RFP and Milestones analyses repeatedly refer to such emission reductions. Draft Serious SIP at 81-84. These sections represent just a few of the SIP elements that are in direct conflict with UPA's submission and that would have to be rewritten should a precursor demonstration be submitted to EPA.

Thank you again for the opportunity to comment on the UPA submission. We hope that you will carefully consider these comments and ultimately reject the suggestion that a precursor demonstration is appropriate. Instead, we hope that you continue to validate the Division's assertion that requiring additional reductions in precursor emissions, including those from major sources, is the only way to achieve attainment in the Salt Lake NAA.



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