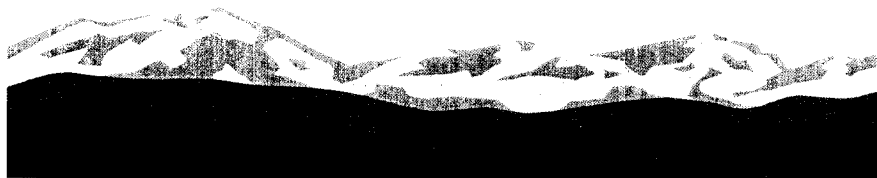


W A S A T C H



Clean Air Coalition

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

OCT 31 2018

DIVISION OF AIR QUALITY

October 31, 2018

Bryce Bird, Director
Utah Division of Air Quality
195 North 1950 West
Salt Lake City, Utah 84114

Thank you for the opportunity to comment on
Utah serious PM2.5 SIP, Section IX. Part A.31. Control Measures for Area and Point Sources

As has become increasingly clear in the last several years, ammonium chloride contributes up to 15% of the PM2.5 on SLC exceedance days¹.

In 2015, Randy Martin's "Measurement of Ambient Hydrochloric Acid near Utah's Great Salt Lake" report eliminated the GSL & its environs, as well as the oil refineries as sources for the chloride in the SLC airshed. The contour plot clearly points to US Magnesium as source.²

As Utah Petroleum Association commented earlier this year, atmospheric chloride is a precursor to PM2.5. U.S. Magnesium plant is the only significant source of chloride emissions affecting the Salt Lake City area and USM emissions are above the level that "contributes significantly" to nonattainment. Controls on U.S. Magnesium will reduce ammonium chloride and PM2.5 in Salt Lake City and could help to attain the NAAQS.

Utah should impose controls on U.S. Magnesium as a necessary step towards achieving attainment as soon as possible.

Thank you for your attention to these comments.

Peace,
Kathy Van Dame, Policy Coordinator
Wasatch Clean Air Coalition
1148 East 6600 South
Salt Lake City, Utah 84121
(801)261-5989 dvd.kvd@juno.com

¹ <https://documents.deq.utah.gov/air-quality/pm25-serious-sip/part-h/DAQ-2018-010750.pdf>

² <https://documents.deq.utah.gov/air-quality/planning/technical-analysis/research/northern-utah-airpollution/gsl-HCl/DAQ-2018-000761.pdf>