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New SIP

1 message

Gary Kunkel

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To: "thomasgunter@utah.gov" <thomasgunter@utah.gov>

HellO! I was reading through the SIP adjustments and had a few thoughts. Is there any way to know what proportion of the refinery fuel ends up consumed by vehicles in the airshed? If it is a sizable percentage I think it should be required that the 10ppm sulfur standard is met by these local refineries. We shouldn't have to be the ones who get the dirty fuel that they can average out by making cleaner fuel elsewhere. Also I appreciate the move forward on flare gas recovery, but think there should be no exemptions (as noted limited exemptions were allowed if it wasn't a certain amount). One last vehicle thought, how about more aggressive citation on folks "rolling coal" or with obviously out of compliance diesel emissions. We could couple the more aggressive citations with the carrot of using citation funds to refund the cost of "undoing" the chips/retrofits (one time per vehicle).

With regard to Kennecott - it doesn't look like there are any new limits? As they are (by far) the biggest point contributor, shouldn't it be low hanging fruit to get their emissions down more? Maybe it's too difficult to squeeze more day to day reductions out of them? If so, how about a voluntary clean cessation of activities during the few weeks out of the year that severe inversion is anticipated? It could be limited to the worst 2 weeks or something like that. It just seems like the elephant in the room that could be doing more for reduction.

Thanks for listening!Gary