

Utah Comments Regarding the Ozone Transport SIP Memo

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To: Possiel, Norm <Possiel.Norm@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>;

Cc: Jay Baker <jbaker@utah.gov>;

Dear Mr. Possiel and Ms. Palma,

Thank you for soliciting comments regarding the March 27, 2018 Memo regarding Interstate Transport SIPs for the 2015 Ozone NAAQS. We in Utah appreciate that EPA recognizes the complexities of ozone transport in the Western United States. Many of the potential flexibilities you've outlined in the memo are issues that we have been studying and learning about for years. As Utah prepares its transport SIP for the 2015 Ozone NAAQS we plan to use some of the flexibilities that you outlined.

Under Step 1 - Identify downwind air quality receptors, it will be important for Utah to assess and project our local emissions reductions. Utah's emissions continue to decrease overall during the past 30 years. They are projected to continue to decrease as we work towards attainment of the current PM2.5 NAAQS and the 2015 Ozone NAAQS. It is unclear whether the projected reductions have been fully accounted for within the modeling.

Under Step 2 - Identify upwind states that contribute to those downwind air quality problems to warrant further review and analysis, Utah plans to discuss consideration of different contribution thresholds. Due to the complex terrain, meteorology, distance between sources and receptors, and somewhat coarse-grained modeling inputs the margin of error in the transport modeling in the Intermountain West is about 15%. With a model error that high it would be unreasonable to set a contribution threshold of 1%. The likelihood of accurately detecting a 1 percent contribution within this margin of error is small. While we are not suggesting that the contribution threshold be set higher than the modeling error, we would suggest that a more appropriate threshold would actually be a range of contribution levels. In addition to considering a contribution threshold that is more in line with the modeling error, we plan to evaluate the "collective contribution" in the receptor region as you've suggested in the flexibilities. While the collective contribution from downwind states in the CSAPR area can range from around 30%-75%, the average contribution from all downwind states to Colorado receptor sites is about 9%. In addition, the international contributions to areas in the Intermountain West are larger than many other areas of the Country.

Thank you for the opportunity to comment on this memo. We also thank you for recognizing the complex issues that the Western States facing with Ozone transport.

Should you have any questions for us, please contact Jay Baker at jbaker@utah.gov or 801-536-4015

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