



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

Air Quality Board
Erin Mendenhall *Chair*
Cassady Kristensen, *Vice-Chair*
Kevin R. Cromar
Mitra Basiri Kashanchi
Randal S. Martin
Alan Matheson
Arnold W. Reitze Jr.
Michael Smith
William C. Stringer
Bryce C. Bird,
Executive Secretary

UTAH AIR QUALITY BOARD WORKING LUNCH
January 2, 2019 – 11:30 a.m.
195 North 1950 West, Four Corners Conference Rooms
Salt Lake City, Utah 84116

FINAL MINUTES

Board members present: Erin Mendenhall, Kevin Cromar, Randal Martin, Alan Matheson, Arnold Reitze, Michael Smith, and Mitra Kashanchi (attendance by phone)

Staff update on the Division of Air Quality Compliance Program.

Jay Morris, Harold Burge, and Robert Ford are the Compliance section managers at DAQ. Major and Minor Source Compliance sections are responsible for ensuring that all regulatory requirements are met at sources subject to state rules and permit requirements. The Air Toxics section is responsible for asbestos and lead-based paint programs. The managers explained the compliance process listing the resources that are available, how inspections are targeted, and how these actions fit in a compliance/enforcement cycle.

Violations can be resolved in two ways, the compliance advisory (CA) and early administrative settlement or formal notice of violation (NOV) process. The CA process is not required in any rules, it is used as a supplemental process as a way to bring sources back into compliance in a shorter timeframe than the NOV process which can take years if it goes through the legal system. The review of which process to use is done on a case-by-case basis. There has been a push to have long-standing enforcement cases go through the legal system to get judges to issue orders that interpret law. The Board has asked that staff put together some recommendations for the penalty categories for violations including descriptions, so that the Board could consider different qualifiers for the Class A, B, or C penalty categories; as well as any other procedural tools that could help move violations along faster and better through the process. Staff will prepare their recommendations and present them to the Board in March.

Mr. Cromar asked why Board meetings are canceled throughout the year. He believes meetings should not be canceled because there are a lot of air quality issues that could be discussed each month even if there are no rules to be brought before the Board. Ms. Mendenhall added that a discussion on the process of how the agendas are created would be helpful. In discussion, it was decided to keep it as is for now and that if there are not sufficient rules to bring forward in a Board meeting, that a working lunch session would work on the off months. The decision on the need for a working lunch could be stated during the Board meeting follow-up items.

Minutes approved: February 6, 2019



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UTAH AIR QUALITY BOARD MEETING

January 2, 2019 – 1:30 p.m.
195 North 1950 West, Room 1015
Salt Lake City, Utah 84116

FINAL MINUTES

I. Call-to-Order

Erin Mendenhall called the meeting to order at 1:36 p.m.

Board members present: Erin Mendenhall, Cassady Kristensen, Kevin Cromar, Randal Martin, Mitra Kashanchi (attendance by phone), Alan Matheson, Arnold Reitze, Michael Smith

Excused: William Stringer

Executive Secretary: Bryce Bird

II. Date of the Next Air Quality Board Meeting: February 6, 2019

III. Approval of the Minutes for November 7, 2018, Board Meeting.

- Arnold Reitze motioned to approve. Randal Martin seconded. The Board approved unanimously.

Ms. Erin Mendenhall states that the public comment period for the final adoption agenda items have already been held. Public requests to make comments today will not be allowed, unless Board members had specific questions.

IV. Final Adoption: SIP Subsection IX.A.31: Control Measures for Area and Point Sources, Fine Particulate Matter, Serious Area PM2.5 SIP for the Salt Lake City, UT Nonattainment Area, as Amended. Presented by Bill Reiss.

Bill Reiss, Environmental Engineer at DAQ, stated that we had already proposed Part H of the state implementation plan (SIP) for public comment in June 2018. Some comments took issue with DAQ's characterization of BACM and BACT (best available control measures and best available control technology) as "generally independent" of the attainment demonstration and the remainder of the SIP. Because the BACT underlying the emission limits in Part H affected not just PM2.5, but also the PM2.5 precursor emissions, NOx, SOx, VOC and NH3, the PM2.5 implementation rule allows that precursor emissions may be exempted from BACT controls where, for example the state has submitted a major stationary source precursor demonstration and the demonstration has been approved by EPA.

Included with one of the comments on Part H was a major stationary source precursor demonstration for each of the four plan precursors. In September 2018, the Board granted the Utah Petroleum Association's (UPA) petition to include its comment with these precursor demonstrations for public review as part of the overall comment period surrounding Part A. DAQ also indicated at that time, that it too would like to independently evaluate each precursor, and do so in consultation with EPA. DAQ's completed model is included as Attachment C.

The serious area SIP for the Salt Lake City PM_{2.5} nonattainment area presented today is in addition to the moderate area SIP that has already been submitted. Among its elements are a demonstration that the area will attain the national ambient air quality standards (NAAQS) by the end of 2019 and provisions to insure the implementation of BACM and BACT. It also contains emission inventories for both the base year and the attainment year, mobile source budgets for the purposes of transportation conformity, quantitative milestones which demonstrate reasonable further progress (RFP), and contingency measures.

Air quality modeling is included in the analysis, but it does not conclude with a likelihood that we will attain the NAAQS by the attainment date at every monitor in the nonattainment area (NAA). Of the six monitors throughout the NAA, Rose Park is still predicted to be over the standard in 2019 at 35.9 ug/m³. However, additional information and analysis is presented alongside the modeling which make up what is called a weight-of-evidence (WOE), to all be considered as a whole in determining whether the area is likely to reach attainment by its attainment date in 2019. The WOE also shows a relationship between the control of precursor emissions and the improvements in PM_{2.5}, and that ambient concentrations of PM_{2.5} are declining. Finally, the WOE considers a daily value identified at Rose Park which could potentially be excluded as an exceptional event because it was influenced by wild land fire. If it was to be excluded, the modeling itself would pass on its own. In essence, we conclude that the entire WOE supports a likelihood that the Salt Lake City NAA will attain the NAAQS in 2019. This would mean that we don't have to ask EPA for an extension of the attainment date and that BACM and BACT is the benchmark for emissions control and not most stringent measures. Having worked with EPA throughout this process, DAQ feels confident this SIP is one that EPA can ultimately approve.

As mentioned before, this SIP was released for a 30 day public comment period alongside the UPA's major source precursor demonstration, in which they conclude that DAQ does not need to require any additional controls from existing major stationary sources for any of the four PM_{2.5} plan precursors. The most significant comment from EPA asked that we bolster the RFP and quantitative milestone discussion. In response, staff added tables that indicate schedules for implementation of the various control measures.

The most significant comments received surrounded the major stationary source precursor demonstration, the accompanying petition by UPA to include a demonstration for each of the plan precursors in the SIP, and to advocate for their approval by EPA. DAQ's response is that it is not electing at this time to include a major stationary source precursor demonstration for any of the four PM_{2.5} plan precursors in this SIP in part by its own precursor analyses which was done in response to the initial comment. In short, UDAQ's analysis uses the final 2019 emissions inventory which was not available when Ramboll did its analyses for UPA; it corrects for bias in the analysis by relating the modeled change in PM_{2.5} to actual on-site observations; it looks at the individual species of PM_{2.5}; it evaluates impact over the entire spatial field of the NAA, in addition to looking at discrete monitoring locations; and it applies a source-apportionment feature of CAMx which estimates how much secondary aerosol, nitrate, sulfate, and ammonium, is from major stationary sources. However, DAQ's stated position includes in every instance the caveat of, "at this time." In doing so, it is acknowledging that the circumstances affecting some of the factors that were considered in reaching this position may

change. They could possibly change as this SIP makes its way through the federal approval process. And it is conceivable that they could change as Utah continues to address 24-hour PM_{2.5} in this NAA.

Given more time to more fully develop such major stationary source precursor demonstrations, one could imagine arriving at an analysis that could likely win subsequent approval by EPA. The “concentration-based” analyses presented thus far are of a coarser variety than what is ultimately allowed by the PM_{2.5} implementation rule. A more refined “sensitivity-based” analysis would likely change some of these conclusions. Better information, particularly with regard to ammonia emissions, will certainly become available. And importantly, the economics surrounding the cost/benefit analysis could change, such that it becomes more appropriate to consider dollars per microgram in addition to the more conventional dollars per ton. Staff recommends that SIP Subsection IX.A, Control Measures for Area and Point Sources, Fine Particulate Matter, Serious Area PM_{2.5} SIP for the SLC, UT NA Area be adopted as amended

In response to the question if the ammonia injection, the model, was done area wide, staff responded that it was done county by county based on some ambient measures. In other response, the exceptional event mentioned at Rose Park was one day, but it’s the value that is collected that represents the 98th percentile for 2015. We incur a lot of events that are influenced by things outside of our local control. Wild land fires being one of those that affect PM_{2.5}, and can be excluded from the record. When staff considers whether to submit an exceptional event, they work closely with EPA on the data record to see if it’s going to have regulatory significance or not.

- Kevin Cromar moved that the Board adopt SIP Subsection IX.A.31: Control Measures for Area and Point Sources, Fine Particulate Matter, Serious Area PM_{2.5} SIP for the Salt Lake City, UT Nonattainment Area, as amended. Arnold Reitze seconded. The Board approved unanimously.

V. Final Adoption: Change in Proposed Rule R307-110-10. Section IX, Control Measures for Area and Point Sources, Part A, Fine Particulate Matter. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that the amendments to Section IX, Control Measures for Area and Point Sources, Part A, Fine Particulate Matter just adopted by the Board will have to be incorporated into the Utah Air Quality Rules. R307-110-10 is the rule that incorporates those amendments. On September 5, 2018, the Board proposed an amended R307-110-10 for a 30 day public comment period. The public comment period was held from October 1, 2018, through October 31, 2018, and no comments were received. Staff recommends that the Board adopt the change in proposed rule 307-110-10 as amended.

- Arnold Reitze motioned that the Board adopt proposed rule R307-110-10. Section IX, Control Measures for Area and Point Sources, Part A, Fine Particulate Matter. Michael Smith seconded. The Board approved unanimously.

VI. Final Adoption: SIP Subsection IX. Part H: Emission Limits and Operating Practices. Specifically Requirements in Subparts H. 1, 2, 11, and 12, as Amended. Presented by Bill Reiss.

Bill Reiss, Environmental Engineer at DAQ, stated that Part H is where any appropriate limits and operating practices are folded into the serious area SIP, specifically for the Salt Lake City NAA. Subparts H.1 and H.2 are for PM₁₀ and Subparts H.11 and H.12 are for PM_{2.5}. For this item, PM₁₀ revisions in Subparts H.1 and H.2 are mainly for consistency with the PM_{2.5} limits that follow. The revisions in Subparts H.11 and H.12 PM_{2.5} have been introduced in order to implement BACT at the existing major stationary sources in support of this serious area SIP. The source-specific BACT reviews included with Part A are essentially the technical basis for what appears in Part H.

Part H was proposed twice for public comment. First in June 2018 where the Utah Petroleum Association (UPA) included in their comments a major stationary source precursor demonstration and also commented that it would be premature to consider BACM and BACT for the PM_{2.5} precursors until the air quality modeling could determine whether in fact certain precursor emissions could or could not be exempted from the BACT provisions.

The second comment period was November 1, 2018, through November 30, 2018, and addressed new information affecting the BACT analyses for four specific sources, Hexcel, Rio Tinto Kennecott, Compass Minerals, and ATK, along with amendments proposed by the Board in October 2018. Most significant comments were issues surrounding any major stationary source precursor demonstrations. A comment asked that DAQ elect to adopt each specific demonstration into the SIP and to then advocate to the EPA for its approval. In addition, that Part H be re-structured to make any new requirements affecting PM_{2.5} precursor emissions provisional; thereby, effective only on the subsequent disapproval by EPA of the respective demonstration.

DAQ's response to the precursor question was already discussed in agenda Item IV. Staff's response to the second point of should Part H be re-structured to conditionally delay any additional control measures affecting precursor emissions is no, since the SIP will not include any such demonstration, it will not be necessary to wait for any subsequent action by EPA.

Mr. Reiss addressed recommendations made by the Board at the October 2018 meeting and explained DAQ's disagreement with each proposal which included: 1) That all stack testing be required at least once per year. 2) That elimination of seasonal differences in emission limitations, such that the more stringent limit be applied throughout the year. This would apply in six specific instances. 3) At Kennecott's Unit 4, that only the combustion of natural gas be permissible, even during summer months.

1) Stack testing frequency, in most cases DAQ believes the current minimum testing frequency of once every three years is adequate. However, it recognizes there are instances where more frequent monitoring is appropriate. Factors to be considered when possibly requiring more frequent testing would include: a variable emission stream; a variety, or a mixture of fuels; a batch processes; or a history of operating near permitted limits. Also, parametric monitoring might be available as an alternate means to provide the continuous data needed to demonstrate that a source is operating within its limits. Having considered these factors, DAQ concludes that it is in fact appropriate to require annual stack testing at each of the following sources: Chemical Lime Company (Lhoist North America) (H.12.c), Compass Minerals (H.12.e.1 and H.12.e.ii), Kennecott Utah Copper – Power Plant (H.12.j), and Nucor Steel Mills (H.12.k). None of the remaining sources meets this criteria and testing every three years is appropriate to ensure compliance.

2) On seasonal limits which may be imposed to enhance the control of emissions during defined periods when atmospheric conditions can intensify the effect on human health. For PM_{2.5}, wintertime atmospheric conditions allow for the chemical reactions necessary to create secondary PM_{2.5}. More restrictive limitations during such periods might be achieved at an affected source by scheduling maintenance outside the period, lowering production, changing feedstocks, or switching fuels. At the end of the seasonal period, the source could resume normal operation and still meet its annual goals. Simply changing a seasonal limit to an annual limit does not always help meet air quality objectives.

3) On Kennecott's Power Plan of fuel switching at Unit 4, it could be a more appropriate BACT determination under different circumstances, an ozone SIP for example, or as a BACT analysis for a

permitting action. But summertime fuel switching at Unit 4 will not help remedy Utah's 24-hour PM2.5 exceedances.

Staff recommends that the Board adopt SIP Subsection IX, Part H, Emission Limits and Operating Practices, and as further amended in Subparts H.1, H.2, H.11, and H.12.

Public response from Joro Walker of Western Resource Advocates addressing the BACT issue was introduced. Ms. Walker states that it is very clear that BACT and BACM both are generally divorced from attainment. It doesn't have to do with attainment, it has to do with what is actually the best available control technology and that is, unless circumstances prevent it, an emission limit. In Subpart H, DAQ lists a series of emission limits for the Kennecott's Unit 4 when it's burning natural gas. That emission limit not surprisingly, is lower than the emissions associated with Unit 4 when it's burning coal. The question becomes which emissions limit represents the maximum production of emissions, and the answer to that is the emissions limits associated with Unit 4 when it's burning natural gas. The determination is that the emissions limits associated the Unit 4 when it burns natural gas represent the lowest emission limit that facility can achieve. So that is the emission limit, and that is what the law requires.

Cassady Kristensen makes a statement that Rio Tinto Kennecott is her employer and as co-chair of the Board she intends to participate and vote, as she can, on this agenda item.

In response to how does seasonal BACT analysis, like was done in the case of Kennecott's Unit 4, satisfy the requirements of 189(b). Mr. Reiss responds that in speaking about the intermittence of a seasonal structured control, DAQ actually has a history of doing this and so we have been past that legal bridge. The distinction is that we define our seasons in terms of the calendar year. It's not intermittent in the way the Clean Air Act (CAA) describes things with respect to how ambient levels may be fluctuating maybe up or down. Rather it's defined as a winter time season during which we incur our cold-pool meteorology and drive our secondary chemistry. We have objectively said that we need to apply BACT during the season when the PM2.5 is the most important. We feel that this satisfies our intent. Ultimately however, it's the EPA that should determine whether in fact we have met BACT in every case.

Public response from Jacob Santini of Parsons, Behle, and Latimer addressing the legal basis for having a seasonal BACT satisfying 189(b) was introduced. Mr. Santini first states that Section 123 prohibits the use of intermittent controls, but that section expresses narrowly what intermittent controls are, which are controls that vary with atmospheric conditions. EPA has said that what that means is that the controls become effective when you reach a certain level. EPA has also explained that seasonal controls are not intermittent controls. So the CAA does not exclude seasonal controls and that you can see that EPA very much embraces seasonal controls when you have a NAAQS that manifests itself in a seasonal increase of emissions. In addition, the PM2.5 implementation rule allows for an inventory based on a season. The inventory that DAQ has relied on excludes all coal emissions from Kennecott's Unit 4. Mr. Santini then describes some of EPA's actions on ozone SIPs, which manifests itself seasonally just like PM2.5, showing that EPA's history allows for seasonal controls. Section 189 does not say anything about annual or not. Section 189 requires BACT to be implemented and so we have a SIP that is designed to fix PM2.5 and Kennecott will implement controls from March 1 to October 31. Finally, going back to BACT, Kennecott is not in the position that it's technically infeasible to operate natural gas year-round, it can. But they have not heard discussion on the economic feasibility which has to be taken into account for a BACT analysis. Kennecott produces its own power and also purchases power from third party utilities. In the summertime they have the option of burning coal or natural gas which impacts the economic analysis. Because of the cost savings in the summertime that are dependent on the flexibility of burning coal or natural gas, Kennecott is able to idle Unit 4

voluntarily during the wintertime inversion season which shows a decrease in wintertime emissions as a result of the flexibility.

Mr. Reitze responds that he is not sure that BACT in 189 is related to the requirement for controlling PM2.5. He believes that BACT is more of an absolute requirement under the CAA.

Mr. Cromar states his frustration that responses to the question of how seasonal BACT meets the requirements of Section 189 was not directly answered. The EPA clearly states that Section 189 is designed to implement measures provided for attainment and to separately adopt emission strategies that will be effective at reducing PM2.5 levels in the area. In addition, the Board made this change to Kennecott in September 2018 with the idea that it would allow the source enough time to submit economic burden showing it was not BACT. There was complete absence of such an analysis in any of the comments.

In response to the limits for a coal-fired boiler in Part H BACT, Jon Black, Major New Source Review Section Manager at DAQ, responded that the BACT analysis was actually based upon a piece of control equipment and not upon a fuel source. So the BACT analysis that was done for Unit 4 actually considered over-fire air, considered selective catalytic reduction (SCR), and low-NOx burners, and was performed for the winter time operation. During the winter time Kennecott has elected to go with natural gas as a fuel source which has been done in the past. One of the benefits of the BACT analysis that was done for the winter time season is that SCR would be applicable year-round. So while it is utilized for natural gas during the wintertime, it will also be utilized during the summertime operation.

- Kevin Cromar motioned that the Board amend the period November 1 to February 28/29 inclusive listed on page 28 line 3 item D; amend the period March 1 to October 1 inclusive on page 29 line 20 item E; amend the period from November 1, to the last day in February inclusive on page 83 line 7 item A.I; and amend the period from March 1 to October 31 on page 83 line 27 item 2.III to the period of year-round January 1 to December 31 so that Kennecott Unit #4 has to operate natural gas year-round. Arnold Reitze seconded.

Discussion to the motion.

Cassady Kristensen recuses herself from this vote and this discussion.

Mr. Smith commented that this SIP is very specific to the PM2.5, but the ozone SIP that is potentially coming down the road would cover the summertime controls that the Board is discussing today. Mr. Reitze agrees that it is appropriate for this SIP. PM2.5 is a harmful health problem even in attainment and BACT was designed to drive the technology to move a more stringent standard independent of the atmospheric concentrations of PM2.5.

Mr. Bird commented that DAQ staff's review on this issue is that the technology is in place. So the most stringent technology is the SCR over fire air and low NOx burners, which is the technology that is in place in this case. And that as was mentioned, this change may actually increase wintertime emissions based on economics.

- After discussion, the Board votes. The motion carries with four in favor (A. Reitze, R. Martin, K. Cromar, E. Mendenhall), two opposed (M. Smith, M. Kachanchi), and one recused (C. Kristensen).

For the second part of this item, Mr. Cromar asks for an explanation of the sequence of events for this document. Specifically, Rio Tinto's comments that reference a DAQ document dated November 30 when their comments should have been received October 31 at DAQ. Staff responds that when the proposal changed at the September meeting, staff created a discussion of the changes made by the Board in the rulemaking submittal to the Office of Administrative Rules. This document is available at the start of the comment period.

Mr. Cromar is also concerned that staff refers to the Board's September decisions as comments and not as actions by the Board. It is recommended that this issue of staff's reaction to Board actions or comments might be presented in a Board work session at a later date.

It was also noted in discussion, that the changes made today are not substantial to require an additional comment period. If approved, it does not become effective until it is published in the State Bulletin for 30 days.

- Arnold Reitze motioned that the Board approve SIP Subsection IX. Part H for final adoption, as amended. Kevin Cromar seconded. The motion carries with five in favor (A. Reitze, R. Martin, K. Cromar, E. Mendenhall, M. Kachanchi) and two opposed (M. Smith, C. Kristensen).

VII. Final Adoption: Change in Proposed Rule, R307-110-17. Section IX, Control Measures for Area and Point Sources, Part H, Emission Limits. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated that the amendments to Section IX, Control Measures for Area and Point Sources, Part H, Emission Limits just adopted by the Board will have to be incorporated into the Utah Air Quality Rules. R307-110-17 is the rule that incorporates those amendments. On June 6, 2018, the Board proposed an amended R307-110-17 for a 45 day public comment period. Due to substantial amendments made following the first comment period, an additional 30 day comment period was proposed by the Board on October 3, 2018. That comment period was held from November 1, 2018, to November 30, 2018. No comments were received during either comment period. Staff recommends that the Board adopt change in proposed rule 307-110-17 as amended.

- Randal Martin motioned that the finally adopt change in proposed rule R307-110-17. Section IX, Control Measures for Area and Point Sources, Part H, Emission Limits. Arnold Reitze seconded. The Board approved unanimously.

VIII. Final Adoption: Change in Proposed Rule R307-511. Oil and Gas Industry: Associated Gas Flaring. Presented by Thomas Gunter.

Thomas Gunter, Rules Coordinator at DAQ, stated after learning that some oil and gas wells throughout the state were unable to utilize the streamlined permitting process approved by the Board in January 2018; DAQ presented the Board with new rule R307-511 on September 5, 2018, as a solution to this issue. On September 5, 2018, the Board proposed R307-511 for a 30 day public comment period. The public comment period was held from October 1, 2018, through October 31, 2018, and comments were received from two organizations. In response to the comments, staff amended R307-511 to provide clarity regarding the definition of "Associated Gas." The amendments do not alter the intent of the rule as originally proposed. Staff recommends that the Board adopt change in proposed R307-511 as amended.

- Kevin Cromar motioned that the Board adopt change in proposed rule R307-511 as amended. Arnold Reitze seconded. The Board approved unanimously.

IX. Informational Items.

A. Regional Haze State Implementation Plan Amendment. Presented by Jay Baker.

Jay Baker, Environmental Scientist at DAQ, stated that in June 2015, DAQ submitted a regional haze SIP to EPA to satisfy BART for PM and NO_x. Staff proposed an alternative to BART for NO_x using a weight-of-evidence (WOE) analysis to prove that the alternative was in fact better than BART. In 2016, EPA approved BART for PM. However, EPA disapproved the alternative to BART for NO_x and stated that the WOE analysis did not show that the alternative was clearly better than BART, and so EPA issued a federal implementation plan (FIP). Utah appealed EPA's decision in the courts and currently the FIP is stayed while staff and EPA work together to come up with something that is approvable.

In working with EPA, they suggest that DAQ do some additional modeling using the CAMX model, and to also use a two-pronged test which is more objective. If you meet both prongs, then you can say the alternative is better. The two-prongs tests would need to show that visibility doesn't decline in any Class I area, and that there is an overall improvement in visibility determined by comparing the average differences between BART and the alternative overall affected Class I areas. DAQ did the tests and results show that the analysis meets both prongs. Staff has is working with EPA

Utah is ready to submit this SIP revision. The plan is currently at a required 60 day review period by federal land managers. Staff plans to bring the regional haze SIP revisions to the Board in March 2019 for a proposal for public comment.

B. Air Toxics. Presented by Robert Ford.

C. Compliance. Presented by Jay Morris and Harold Burge.

D. Monitoring. Presented by Bo Call.

Bo Call, Air Monitoring Section Manager at DAQ, updated on the monitoring charts. DAQ does not have end of year monitoring data as results from filters take a couple of weeks. The current 98th percentile value at Rose Park is 29.2 which is below the standard. That number is with 341 samples in and 24 samples still need to be accounted for. Rose Park uses monitors for both continuous methods and filter methods. Potential exceptional events have been taken into account and flagged for Rose Park which is kind of a controlling monitor.

It was also noted, that our redundant filters are all federal reference filtering monitoring methods, and our issue in the past has been data capture. So if a number of filters are missed then it impacts the 98th percentile value. With the redundant filters we are able to use the monitoring system with the best data capture for a quarter. Each quarter it may be different and so it's not based on the monitored value, it's based on data capture rates.

E. Other Items to be Brought Before the Board.

F. Board Meeting Follow-up Items.

Meeting adjourned at 3:08 p.m.

Minutes approved: February 6, 2019