State of Utah
SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQ-048-25

UTAH AIR QUALITY BOARD MEETING
TENTATIVE AGENDA

Wednesday, June 4, 2025 - 1:30 p.m.
195 North 1950 West, Room 1015
Salt Lake City, Utah 84116

Board members may be participating electronically. Interested persons can participate telephonically by dialing 1-475-299-8810 using access code: 449-801-632#, or via the Internet at meeting link: meet.google.com/dpm-oqgm-nzk

I. Call-to-Order

II. Date of the Next Air Quality Board Meetings: July 2, 2025, and August 6, 2025

III. Approval of the Minutes for the May 7, 2025, Board Meeting.

IV. Propose for Final Adoption: Amend R307-150. Emission Inventories. Presented by Greg Mortensen.

V. Informational Items.
   A. Air Toxics. Presented by Leonard Wright.
   B. Compliance. Presented by Harold Burge, Rik Ombach, and Chad Gilgen.
   C. Monitoring. Presented by Thomas Greene.
   D. Other Items to be Brought Before the Board.
   E. Board Meeting Follow-up Items.

In compliance with the Americans with Disabilities Act, individuals with special needs (including auxiliary communicative aids and services) should contact LeAnn Johnson, Office of Human Resources at (385) 226-4881, TDD (801) 536-4284 or by email at leannjohnson@utah.gov.

ITEM 4

State of Utah

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DAQ-047-25

M E M O R A N D U M

TO: Air Quality Board

THROUGH: Bryce C. Bird, Executive Secretary

THROUGH: Jazmine Lopez, Rules Coordinator

FROM: Greg Mortensen, Inventory Section Manager

DATE: May 20, 2025

SUBJECT: PROPOSE FOR FINAL ADOPTION: Amend R307-150. Emission Inventories.

On February 5, 2025, Division of Air Quality staff proposed changes to R307-150, Emission Inventories, for public comment. The Air Quality Board subsequently approved a 30-day public comment period which was then extended another 15 days by the division after receiving an extension request from the Utah Petroleum Association.

The proposed amendments included:

- Clarification of rule language which erroneously implied that sulfur dioxide (SO_2) requirements would lapse in 2018;
- An added section and definition pertaining to mobile source reporting on point source facilities;
- The removal of decades-old HAPs reporting thresholds which were not documented and could not be reproduced; and
- Clerical language, rule reference corrections, and formatting adjustments.

The division has reviewed and evaluated all comments submitted in writing during the associated 45-day public comment period from March 1 to April 15, 2025, in accordance with section 63G-3-301(11)(b) of Chapter 3 of the Utah Administrative Rulemaking Act. All written comments received by the division have been posted on its webpage where they can be viewed in their entirety and a more detailed summary with specific responses may be reviewed in Appendix A of the board packet. Below is a summary of comments received and responses from the division.

No comments were received in opposition to the proposed change for SO_2 reporting. Various comments focused on the mobile source emissions reporting requirements. As the division reviewed the comments and the rule language itself, it became clear that there is confusion on the applicability, process, and on the need for specifying mobile emissions reporting in the rule. Comments also suggested prepared guidance coupled with public outreach on these submissions would be preferred and/or sufficient. The division agrees that it would be best to remove the mobile emissions reporting proposal at this time to allow for guidance development and outreach. The division is, therefore, removing the proposed section and definition.

Regarding hazardous air pollutants (HAPs), comments noted that other states have HAPs thresholds while the division seems arbitrary in setting no threshold for HAPs reporting. Some comments preferred mirroring a threshold set by other states or continuing with the current rule method. Comments expressed concerns with regulatory uncertainty and asked the division if the use of templates for reporting would be affected.

At least two other states (West Virginia and Oklahoma) also have no threshold for reporting HAPs. Staff contacted states that do have a threshold, and they all noted that thresholds were set based on a Title V HAPs permitting threshold or a figure set decades ago, and they are also uncertain why that figure was chosen. Ultimately, all states noted that the thresholds were essentially arbitrary as they do not account for the different impacts individual HAPs concentrations have on human health and/or air quality chemistry. A static threshold also cannot account for future changes in scientific knowledge of a pollutant's impacts.

It is noteworthy that the division's historic threshold method likely attempted to account for each HAP type having vastly different impacts on human health and the environment at varying concentrations. This is reflected in the multitude of thresholds as each HAP has its own threshold and weighted by American Conference of Governmental Industrial Hygienists (ACGIH) factors.

Unfortunately, not only is this individual calculation daunting and unwieldy for many sources, but when asked by an Air Quality Board member to review these factors, the division was unable to. Continuing with an undocumented method that cannot be replicated and whose factors are in question is also arbitrary and cannot be justified in the division's opinion.

By removing threshold requirements, the division can continue to acknowledge that different HAPs affect human health and air quality chemistry differently without setting an arbitrary threshold. The division believes that, for most reporting facilities (particularly smaller permitted sources), the State and Local Emissions Inventory System (SLEIS) auto population feature saves facilities time and effort in researching the required pollutants for each unit process.

Sources should also experience reduced regulatory uncertainty as they do not need to calculate a threshold for each HAP, estimate all their HAP emissions, and verify they are below the calculated threshold (this is very challenging for smaller sources who often rely on administrative staff to do so). The rule eases regulatory burden on the sources by allowing the division's software (SLEIS) to calculate HAPs emissions. This process is also supported by the certification language sources agree to in SLEIS and R307-150 that the emissions inventory is to the "best knowledge" of the person submitting coupled with EPA's definition that an emissions inventory is "a comprehensive and detailed estimate of air emissions."[1]

[1] United States Environmental Protection Agency. (2025, April 16). National Emissions Inventory (NEI). https://www.epa.gov/air-emissions-inventories/national-emissions-inventory-nei

Furthermore, setting no threshold also aligns this rule with the current Division of Air Quality Notice of Intent (NOI) permitting requirements under UAC R307-410-5(1)(c) Submittal Requirements. The division requires all increases to be examined or evaluated. Therefore, there is no reporting threshold for HAPs and all HAPs above zero should be included in the NOI.

Some sources use templates and upload them into SLEIS and asked if this option would be affected. The division can confirm that this feature is not affected by SLEIS's upgrades. As a matter of fact, sources successfully used template uploads after the autopopulation feature was added to SLEIS in 2024.

Finally, comments included some clerical adjustments to rule references if the rule is adopted by the Board. The division appreciates the additional review and has adjusted the final rule proposal with technical adjustments where appropriate. The Utah Office of Administrative Rules also identified some additional changes to bring rule R307-150 into compliance with Executive Order 2021-12.

Recommendation: Staff recommends the Board approve the proposed amendments to rule R307-150, Emission Inventories, for final adoption.

APPENDIX A

2024 Amendment to R307-150. Emission Inventories. Response to Public Comment.

The Utah Division of Air Quality (the Division, UDAQ) has reviewed and evaluated all comments submitted in writing during the associated 45-day public comment period in accordance with section 63G-3-301(11)(b) of Chapter 3 of the Utah Administrative Rulemaking Act. All written comments received by the Division have been posted on its webpage where they can be viewed in their entirety. Below is a summary of comments received and responses from the Division, divided by the topic of the amendment.

Amendments to Sulfur Dioxide Milestone Inventory Requirements:

The Division received one comment mentioning the Sulfur Dioxide Milestone amendments:

RTK Comment 1: "KUC understands that UDAQ opened up R307-150 for revisions in order to make necessary administrative changes to the rule related to the SO2 reporting language[1]."

UDAQ Response: As stated in the February 5, 2025, Board memorancum, the Division is amending R307-150 due to Board member questions from 2020 regarding the HAPs exemptions and definitions. The SO2 reporting language is outdated, and since the Division is proposing to amend this rule, it includes changes to the Sulfur Dioxide Milestone requirements.

Amendments to the Hazardous Air Pollutants (HAPs) Exemptions and Definitions:

The Division received comments from three entities regarding the amendments to HAPs reporting.

- Rio Tinto Kennecott
- Utah Petroleum Association
- Utah Mining Association

Comments from Rio Tinto Kennecott (RTK)

RTK Comment 2: "For proposing to remove the HAPs thresholds from the rule, UDAQ outlines that they cannot recreate the thresholds. As a replacement, they assert that having no threshold is appropriate because:

> *SLEIS is now able to automatically populate any HAPs emission factors with standard, well-defined methodology, therefore negating the need for exemption limits.*

This feature of SLEIS is not a justification for removing the thresholds. SLEIS is a tool for submitting inventory data. The use of the tool does not guarantee compliance and UDAQ is assuming user reliance on the tool."

UDAQ Response: The Division appreciates this point of view. This quoted statement is from the *Notice of Substantive Change* for the rule amendments. The previous sentence says, "DAQ is removing the HAPs exemption limits as staff were unable to replicate the calculation methodology employed in the existing rule." This feature in SLEIS is not the justification for removing the thresholds; they are being

removed because there is no evidence of where the factors in R307-150-7(2)(b)-(d) originated, nor the explicit exemption levels in R307-150-7(1). This feature in SLEIS provides the solution to this issue, and since SLEIS can calculate to 15 places past the decimal point, there is no need to retain exemption thresholds.

The Division is responsible for collecting emissions inventories from a wide variety of facilities, and the automatic population feature is a prompt for most facilities to display the pollutants that should be reported for the particular piece of equipment. In 2023, 88% of reporting facilities utilized the built-in emission factors, resulting in 53% of emissions reported in SLEIS calculated this way. Therefore, the Division believes it is correct to assume that users are relying on this tool.

There are many aspects to consider in "guaranteeing compliance," but part of the quality control process conducted by Division staff is comparing reported pollutants to those with available emission factors. When these two items match, that is one aspect of the inventory staff can consider complete. Additionally, a facility should review what has been pre-populated; if a facility feels additional HAPs should be added to the list of those pre-populated by SLEIS, they can add those pollutants or delete them if they feel the unit process does not create that pollutant. A facility ultimately agrees the report is compliant when they check the box "I have reviewed the electronic report being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge" during the submission process.

RTK Comment 3: "KUC uses the template upload feature to populate the data into SLEIS for submittal. It is unclear if UDAQ considered this feature in their review."

UDAQ Response: UDAQ did not specifically address this during the initial proposal, as the template upload feature is not affected by the proposed change nor by the SLEIS HAPs auto-calculation feature, but how the upload feature is used could impact the autopopulation process. When a facility downloads the template, it will show what pollutants were reported in the most recently submitted report, and auto populate any other pollutants that have an emission factor based on the Source Classification Code (SCC) and throughput combination.

Ideally, facilities download the template, modify it, and upload it back into SLEIS. However, if a facility only uploads the document, meaning they bypass SLEIS's downloadable template and upload a different spreadsheet, then the facility would miss any auto populated pollutants SLEIS suggests. The facility can submit this, and if Division staff have questions about pollutants that would have auto populated, they will contact the facility.

Joint comments from Utah Petroleum Association and Utah Mining Association

Joint Association Comment 1: "Sources can now use process knowledge to determine if reporting may be required, especially if they have information that the process does not contain or does not emit a particular HAP. In the absence of reporting thresholds, sources must certify that the emissions of many HAPs are zero, a difficult certification to make because, even with process knowledge that a certain HAP may not be expected to be emitted, it may be emitted in a trace or very small quantity."

UDAQ Response: The Division believes that for the majority of reporting facilities, the autopopulation feature saves time and effort in researching the required pollutants for each unit process. For those facilities that did use the exemption guidelines to determine if a pollutant needed to be reported, they will have a number to report since they had to determine if it was exempt. Again, SLEIS is capable of reporting to 15 places past the decimal point, and if a facility believes a HAP is present at a trace amount,

then they can estimate that in SLEIS. Division staff would not question a facility for not reporting a pollutant if there is no expected emission factor based on the SCC and throughput combination.

Facilities can also rely on their submitted Notice of Intent (NOI), which should consider any HAPs a unit process would create, as permitting has no HAPs reporting threshold and requires all HAPs to be submitted as part of the application.

Joint Association Comment 2: "Incorporating the calculations into SLEIS will reduce the workload but is not part of the rulemaking. ***Eliminating the thresholds, which is part of the rulemaking, will likely increase the workload for many facilities, especially those subject to the certification requirement of existing R307-150-9.***"

UDAQ Response: If a facility is utilizing the listed exemptions, then it is already calculating or estimating its HAPs, so that workload should not increase much more than now they must enter the calculated HAPs into SLEIS. In addition, this would be a one-time work task, since once a pollutant is reported for a unit process, it will populate for the next report. If the facility enters the emission factor using an _1 or _2 calculation method, that pollutant will be automatically calculated in future years. Additionally, if a facility needs to revise its calculation method for a particular HAP, that should also be a one-time work task, as the same method will likely be used in the following years.

The certification language in R307-150-9(2)(a) "a certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement" is similar to the SLEIS submissions check box "I have reviewed the electronic report being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge." Therefore, facilities subject to R307-150-9 are not held to any higher standard than all users in SLEIS.

Joint Association Comment 3: "SLEIS bases its calculations on AP-42 emission factors or similar information (unless the reporting facility adds additional detail of emissions for its specific equipment) and as discussed earlier in this letter, AP-42 factors are known to have inherent inaccuracies.

Thus, relying on SLEIS calculations to show that an emission of a HAP is zero countermands the required certification in existing R307-150-9."

UDAQ Response: The cited document *EPA Reminder About Inappropriate Use of AP-42 Emission Factors* states that the intended use for AP-42 emission factors is for the development of annual or triennial inventories. While AP-42 is considered the least accurate of the listed techniques to quantify emissions, it is the only technique many facilities have available. In the document, EPA urges facilities to "use the most representative emissions data." Therefore, if a facility has more accurate techniques such as Continuous Emissions Monitoring System (CEMS) or stack tests, those emission factors should be used instead of AP-42, particularly if they are required in the facility's approval order. Division staff, however, would not expect a facility to use these techniques if they are not listed in their approval order. Also, R307-150-9 only requires facilities to report "the total actual emissions of oxides of nitrogen and volatile organic compounds in tons per year for each emission unit." Therefore, facilities subject to R307-150-9 do not need to certify that any HAPs are zero.

Joint Association Comment 4: "It is not clear if facilities would need to do sampling to measure concentrations of HAPs that are expected to be low. If yes, then protocols would need to be specified in the rulemaking for sampling in every type of situation and for analyses, and the amount of work and associated costs would increase inordinately."

UDAQ Response: R307-150 does not specify sampling for any pollutants; rather, this type of requirement is listed in a facility's Approval Order. A facility should consider any HAPs emissions when they submit their NOI; therefore, at the step of reporting their emissions, the facility should know which HAPs each unit process is expected to emit.

Joint Association Comment 5: "Furthermore, although the existing reporting thresholds in R307-150 seem to be arbitrary because UDAQ cannot replicate them or find their original bases, eliminating the thresholds entirely is equally arbitrary. Why not move the threshold to ten pounds per year like Louisiana and Wyoming use? Why not choose 200 pounds per year like South Carolina uses?[25] With the information currently in hand, any change to the reporting thresholds is arbitrary."

UDAQ Response: At least two other states (West Virginia and Oklahoma) also have no threshold for reporting HAPs. South Carolina staff do not know where their 200 lb. threshold originated. They are in a similar situation where their rule has been in place for 20 years, and any staff who knew the threshold origins have retired. Louisiana's exemption thresholds are similar to the current R307-150 thresholds; they are not a straight 10 lb. exemption but instead were modeled based on available Threshold Limit Values (TLV) and carcinogenic data in 1990 and have not been revisited in 35 years.

Wyoming's 10 lb. threshold is not in their regulation; it is just a known guidance that facilities do not need to report HAPs emissions under 10 lbs. Because it is not in the regulation, Wyoming DEQ still can ask for HAPs emissions under 10 lbs. if they determine there is a need.

Ultimately, states with thresholds noted that the thresholds were essentially arbitrary as they do not account for the different impacts individual HAPs concentrations have on human health and/or air quality chemistry.

Although HAPs are often a small contributor by mass to total VOC concentrations in an airshed, they are often the most reactive concentrations. The Division quantifies this with the Maximum Incremental Reactivity (MIR), which estimates how much ozone could be generated from a specific VOC. Toluene (MIR of ~4) and Xylenes (MIR ~8) are examples of highly reactive aromatic concentrations, all of which are on the HAPs list. MIRs assume that, under ideal ozone-forming conditions, one molecule of toluene would generate four molecules of ozone. The more we can control the highly reactive concentrations, such as HAPs with elevated MIRs, the less prone our airshed is to ozone formation.

Finally, it should be remembered that aside from elevated MIRs, HAPs are also harmful to human health. Many are known carcinogens, and it is important to know the origin and amount of these pollutants in our airshed.

Joint Association Comment 6: "Although UDAQ cannot locate or replicate the basis for current thresholds, the thresholds are sufficiently detailed that UDAQ probably had a basis at the time of adopting them."

UDAQ Response: The thresholds are based on R307-410. Permits: Emissions Impact Analysis.

From the November 15, 1998, Utah State Bulletin:

In Subsection R307-155-1(2), this proposal establishes a de minimis level for HAP emissions. This level is below the emission threshold value calculated using the worst case factors already established in the HAP modeling rule. The cutoff level will change for an individual HAP if Threshold Limit Value for the chemical is changed. The exact cutoff can be listed in the instructions provided by DAQ and changed as needed without requiring a rule change.

DAQ cannot provide instructions because we do not understand the reasoning for the factors. We agree there was a basis, but they are indefensible because we have no proof of why they chose these numbers. Also, as noted in the response to Joint Association Comment #5, science evolves over 25+ years. The Division now understands that HAPs, while a lower percentage of VOC emissions in our airshed, have a higher potential for generating ozone. Understanding the origins and amounts of these pollutants provides the Division with additional information to reduce ozone formation.

It is noteworthy that UDAQ's current threshold method likely attempted to account for each HAP type having vastly different impacts on human health and the environment at varying concentrations. This is reflected in the multitude of thresholds as each HAP has its own threshold weighted by American Conference of Governmental Industrial Hygienists (ACGIH) factors.

Unfortunately, not only is this individual calculation daunting and unwieldy for many sources, but when asked by an Air Quality Board member to review these factors, UDAQ was unable to. Continuing with an undocumented method which cannot be replicated with factors that are in question is also arbitrary and cannot be justified in UDAQ's opinion.

By removing threshold requirements, UDAQ can continue to acknowledge that different HAPs affect human health and air quality chemistry differently without setting arbitrary thresholds. This also reduces the calculation burden for many sources (particularly smaller permitted sources).

Joint Association Comment 7: "*The Associations recommend that UDAQ not eliminate or change the HAP reporting thresholds at this time.*"

UDAQ Response: The requested review and changes were recommended by two Board members, and upon review, the Division determined that we could not rebuild the historical context for the previous language and can no longer justify it.

Additionally, if the thresholds are left as-is, facilities will need to make the calculations on their own using the 2003 version of the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices." See the UDAQ response to Joint Association Comment #6 above for details.

Joint Association Comment 8: "...in our estimation, eliminating the threshold will *increase* the workload and does not reduce uncertainty. Sources can now use process knowledge to determine if reporting may be required, especially if they have information that the process does not contain or does not emit a particular HAP. In the absence of reporting thresholds, sources must certify that the emissions of many HAPs are zero, a difficult certification to make because, even with process knowledge that a certain HAP may not be expected to be emitted, it may be emitted in a trace or very small quantity. Thus, we do not agree with the following statement from the fiscal information section of the rule analysis, 'there is a strong potential that this will reduce workload for sources as they are already expected to determine if their HAP emissions are above or below the threshold in the current rule which involves a complex calculation for each pollutant'."

UDAQ Response: The Division disagrees. HAPs should have been considered when submitting the NOI for the equipment. Facilities should know what HAPs are expected from each unit process. If they have not been calculated in the past, this will be a one-time work task to create the calculations that can be replicated each time an inventory is due.

Joint Association Comment 9: "Furthermore, uncertainties in emission factors will make the important aspect of certifying any emission estimate of zero an untenable task."

UDAQ Response: While the Division appreciates the task of generating emissions inventories and the attention to detail required to produce an accurate report, it would like to remind facilities that certification in SLEIS and R307-150 is to the "best knowledge" of the person submitting. By EPA's definition, an Emissions Inventory is "a comprehensive and detailed **estimate** of air emissions".[1] [Emphasis added]

Amendments to Add Point Source Mobile Emissions Reporting:

The Division received comments from five entities regarding point source mobile emissions reporting:

- John Rasband, Air Quality Board Member, Petersen Incorporated
- Chevron Products Company, Salt Lake Refinery
- Rio Tinto Kennecott
- Utah Petroleum Association
- Utah Mining Association

The Division acknowledges the various comments focused on the mobile source emissions reporting requirements. As UDAQ reviewed the comments and the rule language itself, it became clear that there is confusion on the applicability, process, and on the need for specifying mobile emissions reporting in the rule. Comments also suggested preparing guidance coupled with public outreach on these submissions would be preferred and/or sufficient. UDAQ agrees that it would be best to remove the mobile emissions reporting proposal at this time to allow for guidance development and outreach. UDAQ is, therefore, removing the proposed section.

Clerical/Administrative Amendments:

Joint Association Comment 10: "UDAQ indicated that a major source or Part 70 source of emissions with Standard Industrial Classification codes in the major group 13 would be subject to major source and Part 70 source reporting under R307-150-6 and also to oil and gas industry reporting under existing R307-150-8.[26] R307-150-3(1)(c) indicates that large stationary sources of sulfur dioxide, i.e. those with 100 tons per year or more of sulfur dioxide emissions, "may be subject to other sections of Rule R307-150-3." For clarity, we recommend that a similar statement be added in the appropriate location to indicate the same for major sources and Part 70 sources with Standard Industrial Classification codes in the major group 13."

UDAQ Response: This first sentence is misinterpreted; R307-150-3(4)(a) means that any facilities, including major sources and Part 70 sources, are **excluded** from R307-150-8. Therefore, if a facility is in the major group 13, and **not** one of the listed facilities to which R307-150-5 and -6 are applicable, then it reports in the Crude Oil and Natural Gas Source Category. In plain language, this means if a facility qualifies under R307-150-3(1) through (3), they report to SLEIS; otherwise, they report to UDAQ's oil and gas inventory lead via the Oil and Gas Emissions Inventory.

[1] United States Environmental Protection Agency. (2025, April 16). *National Emissions Inventory (NEI)*. https://www.epa.gov/air-emissions-inventories/national-emissions-inventory-nei

Joint Association Comment 11: Due to eliminating R307-150-7 Exempted Hazardous Air Pollutants, the Proposal renumbers subsequent sections. Therefore, references to subsequent sections need to be renumbered accordingly. We recommend renumbering the references to Section "R307-150-8" to "R307-105-7." The incorrect references appear in R307-150(4) and R307-150(4)(a). Similarly, the reference to "R307-150-9" in R307-150-3(5) should be updated to "R307-150-8."

UDAQ Response: The Division appreciates this feedback and will incorporate it in the final version of the rule.

Joint Association Comment 12: "The rule analysis indicates the statutory authority for the rule to be "Section 19-6a-1642" which needs to be corrected."

UDAQ Response: The Division appreciates the associations catching this error. The correct reference is 19-2-104.

Comments Regarding Workload:

The Division received multiple comments from Rio Tinto Kennecott regarding the amount of work and resources necessary to report emissions inventories and the timing of these proposed amendments. The Division appreciates and acknowledges the amount of effort required by facility staff to complete an emissions inventory and the attention to detail required to produce accurate emissions estimates. Division staff know this through working with the nearly 600 facilities reporting triennially, and 200 reporting annually. Through phone calls, emails, and Google Meet screenshare sessions, Division staff assist facilities to help them successfully submit the best inventory possible. Staff regularly work with facilities that have no designated staff to complete this task, who lack computer skills and the knowledge, understanding, and/or purpose of an emissions inventory.

The Division apologizes that the timing of these proposed amendments coincided with the reporting period. The original due date for public comments did not coincide with the inventory due date, but the Division received a request to extend the public comment period, resulting in these two deadlines falling on the same day. This was not the intention; staff have been working on these proposed amendments for four years, and the due date was truly coincidental.

State of Utah
Administrative Rule Analysis
Revised May 2025

NOTICE OF SUBSTANTIVE CHANGE		
TYPE OF FILING: CPR (Change in Proposed Rule)		
Rule or section number:	**R307-150**	**Filing ID: OFFICE USE ONLY**
Date of previous publication (only for CPRs):	**03/01/2025**	

Agency Information

1. Title catchline:	Environmental Quality, Air Quality	
Building:	Multi-Agency State Office Building	
Street address:	195 N 1950 W	
City, state:	Salt Lake City, UT	
Mailing address:	PO Box 144820	
City, state and zip:	Salt Lake City, UT 84114-4820	
Contact persons:		
Name:	**Phone:**	**Email:**
Greg Mortensen	385-226-6171	gmortensen@utah.gov
Jazmine Lopez	801-536-4050	jazminelopez@utah.gov
Please address questions regarding information on this notice to the persons listed above.		

General Information

2. Rule or section catchline:

R307-150. Emission Inventories.

3. Are any changes in this filing because of state legislative action?	Changes are not because of legislative action.
If yes, any bill number and session:	

4. Purpose of the new rule or reason for the change:

Rule R307-150 is being updated to continue to collect HAPs without setting an arbitrary one-size-fits-all threshold and reflect what our State and Local Emissions Inventory System (SLEIS) database is capable of. The Division of Air Quality (DAQ) is removing the HAPs exemption limits as staff were unable to replicate the calculation methodology employed in the existing rule which attempted to address different human health and environmental impacts by different HAPs concentrations. By removing threshold requirements, the Division can continue to acknowledge that different HAPs affect human health and air quality chemistry differently without setting arbitrary thresholds. Ultimately, the DAQ needs to catch the rule up on Hazardous Air Pollutants (HAPs) to adhere to scientific realities, reflect what sources are already reporting, and what SLEIS is also already able to do. SLEIS is now able to automatically populate any HAPs emission factors with standard, well-defined methodology. This is a much-simplified means for most facilities to report their HAPs emissions. DAQ staff believe this will also provide more accurate and consistent HAPs data while also streamlining HAPs reporting with criteria pollutants. Staff is also taking the opportunity to update the sulfur dioxide (SO_2) reporting requirements by removing a conflicting statement indicating an erroneous end date for SO_2 reporting. Additionally, other revisions have been made to correct rule section references and bring the rule into compliance with Executive Order 2021-12.

5. Summary of the new rule or change:

The amendments to Rule R307-150 will remove HAPs threshold calculation and HAPs reporting exemptions, update SO_2 reporting language and remove the outdated timeline for SO_2 reporting period, and make rule language changes to bring the rule into compliance with Executive Order 2021-12 and make rule section reference corrections.

Fiscal Information

6. Provide an estimate and written explanation of the aggregate anticipated cost or savings to:

A. State budget:

There are no anticipated costs or savings to the state budget associated with the amendments to Rule R307-150. No additional costs are expected as the automated HAPs enhancement is already included in the current SLEIS maintenance agreement and HAPs are already reported by many facilities in SLEIS. All other changes are administrative language changes for portions of the rule already in effect.

B. Local governments:

There are no savings or negligible costs anticipated for HAPs reporting due to automated processes for local governments associated with the amendments to Rule R307-150.

C. Small businesses ("small business" means a business employing 1-49 persons)**:**

There are no savings or negligible costs anticipated for HAPs reporting due to automated processes for small businesses associated with the amendments to Rule R307-150.

D. Non-small businesses ("non-small business" means a business employing 50 or more persons)**:**

There are no savings or negligible costs anticipated for HAPs reporting due to automated processes for non-small businesses associated with the amendments to Rule R307-150.

E. Persons other than small businesses, non-small businesses, state, or local government entities ("person" means any individual, partnership, corporation, association, governmental entity, or public or private organization of any character other than an ***agency***)**:**

There are no savings or negligible costs anticipated for HAPs reporting due to automated processes for non-small businesses associated with the amendments to Rule R307-150.

F. Compliance costs for affected persons:

Removing the HAPs reporting thresholds should have negligible workload increase as SLEIS will automatically calculate HAPs based on the already required activity data for their annual emission inventory reports. Additionally, there is a strong potential that this will reduce workload for sources as they are already expected to determine if their HAP emissions are above or below the threshold in the current rule which involves a complex calculation for each pollutant. For smaller sources, it is not uncommon that administrative staff are tasked with submitting the inventory and are confused by these thresholds. This not only expends their time and agency time supporting them but also exposes sources to potential compliance costs if they fail to report a HAP as they guessed or erroneously calculated that they were below the threshold. SLEIS's HAPs auto-calculation capability alleviates this burden and allows sources to simply populate their processes with already-required activity data.

G. Regulatory Impact Summary Table (This table includes only fiscal impacts the agency was able to measure. If the agency could not estimate an impact, it is excluded from this table but described in boxes A through F.)

Regulatory Impact Summary Table

Fiscal Cost	**FY2026**	**FY2027**	**FY2028**	**FY2029**	**FY2030**
State Budget	$0	$0	$0	$0	$0
Local Governments	$0	$0	$0	$0	$0
Small Businesses	$0	$0	$0	$0	$0
Non-Small Businesses	$0	$0	$0	$0	$0
Other Persons	$0	$0	$0	$0	$0
Total Fiscal Cost	**$0**	**$0**	**$0**	**$0**	**$0**
Fiscal Benefits	**FY2026**	**FY2027**	**FY2028**	**FY2029**	**FY2030**
State Budget	$0	$0	$0	$0	$0
Local Governments	$0	$0	$0	$0	$0
Small Businesses	$0	$0	$0	$0	$0
Non-Small Businesses	$0	$0	$0	$0	$0
Other Persons	$0	$0	$0	$0	$0
Total Fiscal Benefits	**$0**	**$0**	**$0**	**$0**	**$0**
Net Fiscal Benefits	**$0**	**$0**	**$0**	**$0**	**$0**

H. Department head comments on fiscal impact and approval of regulatory impact analysis:

The Executive Director of the Department of Environmental Quality, Tim Davis, has reviewed and approved this regulatory impact analysis.

Citation Information

7. Provide citations to the statutory authority for the rule. If there is also a federal requirement for the rule, provide a citation to that requirement:

Section 19-2-104		

Incorporation by Reference Information

8. Incorporation by Reference (if this rule incorporates more than two items by reference, please include additional tables)**:**	
A. This rule adds or updates the following title of material incorporated by reference (a copy of the material incorporated by reference must be submitted to the Office of Administrative Rules. *If none, leave blank*)**:**	
Official Title of Materials Incorporated (from title page)	
Publisher	
Issue Date	
Issue or Version	

B. This rule adds or updates the following title of material incorporated by reference (a copy of the material incorporated by reference must be submitted to the Office of Administrative Rules. *If none, leave blank*)**:**	
Official Title of Materials Incorporated (from title page)	
Publisher	
Issue Date	
Issue or Version	

Public Notice Information

9. The public may submit written or oral comments to the agency identified in box 1.		
A. Comments will be accepted until:		
B. A public hearing (optional) will be held (The public may request a hearing by submitting a written request to the agency, as outlined in Section 63G-3-302 and Rule R15-1.)**:**		
Date:	**Time** (hh:mm AM/PM)**:**	**Place** (physical address or URL)**:**
To the agency: If more than one hearing is planned to take place, continue to add rows.		

10. This rule change MAY become effective on:	08/01/2025
NOTE: The date above is the date the agency anticipates making the rule or its changes effective. It is NOT the effective date.	

Agency Authorization Information

To the agency: Information requested on this form is required by Sections 63G-3-301, 63G-3-302, 63G-3-303, and 63G-3-402. The office may return incomplete forms to the agency, possibly delaying publication in the *Utah State Bulletin* and delaying the first possible effective date.			
Agency head or designee and title:	Bryce C. Bird, Director, Division of Air Quality	**Date:**	05/13/2025

R307. Environmental Quality, Air Quality.
R307-150. Emission Inventories.
R307-150-1. Purpose and General Requirements.

(1) The purpose of Rule R307-150 is to establish:

(a) by rule, the time frame, pollutants, and information that sources shall include in inventory submittals; and

(b) consistent reporting requirements for stationary sources in Utah to determine whether sulfur dioxide emissions remain below the sulfur dioxide milestones established in the State Implementation Plan for Regional Haze, Section XX.E.1.a, incorporated by reference, in Section R307-110-28.

(2) The requirements of Rule R307-150 replace any annual inventory reporting requirements in approval orders or operating permits issued before December 4, 2003.

(3) Emission inventories shall be submitted on or before April 15 of each year following the calendar year for which an inventory is required. The inventory shall be submitted in a format specified by the Division of Air Quality following consultation with each source.

(4) The Director may require at any time a full or partial-year inventory upon reasonable notice to affected sources when it is determined that the inventory is necessary to develop a state implementation plan, to assess whether there is a threat to public health or safety or the environment, or to determine whether the source is in compliance with Title R307.

(5) Recordkeeping requirements include the following:

(a) each owner or operator of a stationary source subject to this rule shall maintain a copy of the emission inventory submitted to the Division of Air Quality and records indicating how the information submitted in the inventory was determined, including any calculations, data, measurements, and estimates used;

(i) the records under Section R307-150-4 shall be kept for ten years;

(ii) other records shall be kept for a period of at least five years from the due date of each inventory;

(b) the owner or operator of the stationary source shall make these records available for inspection by any representative of the Division of Air Quality during normal business hours.

R307-150-2. Definitions.

The following additional definitions apply to Rule R307-150:

"Emissions unit" means emissions unit as defined in Section R307-415-3.

"Large Major Source" means a major source that emits or has the potential to emit 2,500 tons or more per year of oxides of sulfur, oxides of nitrogen, or carbon monoxide, or that emits or has the potential to emit 250 tons or more per year of PM_{10}, $PM_{2.5}$, volatile organic compounds, or ammonia.

"Lead" means elemental lead and the portion of its compounds measured as elemental lead.

"Major Source" means major source as defined in Section R307-415-3.

[~~"Mobile Emissions" means emissions from mobile sources as defined in 40 CFR [§] 51.491 which never leave the property line.~~]

R307-150-3. Applicability.

(1) Section R307-150-4 applies to stationary sources with actual emissions of 100 tons or more per year of sulfur dioxide in calendar year 2000 or any subsequent year unless exempted in Subsection R307-150-3(1)(b).

(a) Stationary sources subject to Subsection R307-150-3(1) that emit less than 100 tons per year of sulfur dioxide in any subsequent year shall remain subject to Section R307-150-4.

(b) Stationary sources that meet the requirements of Subsection R307-150-3(1) that have permanently ceased operation are exempt from the requirements of Section R307-150-4 for the years during which the source did not operate at any time during the year, except for the Carbon Power Plant, which, beginning with 2016 emissions, the Division of Air Quality shall include emissions of 8,005 tons per year of sulfur dioxide in the annual regional sulfur dioxide milestone report required as part of the Regional Haze State Implementation Plan.

(c) Sources subject to Section R307-150-4 may be subject to other sections of Rule R307-150.

(2) Section R307-150-5 applies to large major sources.

(3) Section R307-150-6 applies to each:

(a) major source that is not a large major source;

(b) source with the potential to emit five tons or more per year of lead;

(c) source not included in Subsection R307-150-3(2), R307-150-3(3)(a), or R307-150-3(3)(b) that is located in Davis, Salt Lake, Utah, or Weber Counties and that has the potential to emit 25 tons or more per year of any combination of oxides of nitrogen, oxides of sulfur and PM_{10}, or the potential to emit ten tons or more per year of volatile organic compounds; and

(d) Part 70 source not included in Subsection R307-150-3(2), R307-150-3(3)(a), R307-150-3(3)(b), or R307-150-3(3)(c).

(4) Section R307-150-[~~8~~]7 applies to sources with Standard Industrial Classification codes in the major group 13 that have uncontrolled actual emissions greater than one ton per year for a single pollutant of PM_{10}, $PM_{2.5}$, oxides of nitrogen, oxides of sulfur, carbon monoxide, or volatile organic compounds. These sources include, industries involved in oil and natural gas exploration, production, and transmission operations, well production facilities, natural gas compressor stations, natural gas processing plants, and commercial oil and gas disposal wells, and ponds. Sources that require inventory submittals under Subsections R307-150-3(1) through (3) are excluded from the requirements of Section R307-150-7.

[~~(a) Sources that require inventory submittals under Subsections R307-150-3(1) through (3) are excluded from the requirements of Section R307-150-8.~~]

(5) Section R307-150-[~~9~~]8 applies to stationary sources located in a designated ozone nonattainment area that have the potential to emit oxides of nitrogen or volatile organic compounds greater than 25 tons per year.

R307-150-4. Sulfur Dioxide Milestone Inventory Requirements.

(1) Annual Sulfur Dioxide Emission Report requirements are as follows.

(a) Sources identified in Subsection R307-150-3(1) shall submit an annual inventory of sulfur dioxide emissions beginning with calendar year 2003 for emissions units including fugitive emissions.

(b) The inventory shall include the rate and period of emissions, excess or breakdown emissions, startup and shut down emissions, the specific emissions unit that is the source of the air pollution, type and efficiency of the air pollution control equipment, percent of sulfur content in fuel and how the percent is calculated, and other information necessary to quantify operation and emissions and to evaluate pollution control efficiency. The emissions of a pollutant shall be calculated using the source's actual operating hours, production rates, and types of materials processed, stored, or combusted during the inventoried period.

(2) Each source subject to Section R307-150-4 that is also subject to 40 CFR Part 75 reporting requirements shall submit a summary report of annual sulfur dioxide emissions that were reported to the Environmental Protection Agency under 40 CFR Part 75 in lieu of the reporting requirements in Subsection (1).

(3) Changes in Emission Measurement Techniques include:

(a) each source subject to Section R307-150-4 that uses a different emission monitoring or calculation method than was used to report their sulfur dioxide emissions in 2006 under Rule R307-150 or 40 CFR Part 75 shall adjust their reported emissions to be comparable to the emission monitoring or calculation method that was used in 2006; and

(b) the calculations that are used to make this adjustment shall be included with the annual emission report.

R307-150-5. Sources Identified in Subsection R307-150-3(2), Large Major Source Inventory Requirements.

(1) Each large major source shall submit an emission inventory annually beginning with calendar year 2002. The inventory shall include PM_{10}, $PM_{2.5}$, oxides of sulfur, oxides of nitrogen, carbon monoxide, volatile organic compounds, and ammonia for emissions units including fugitive [~~and mobile~~] emissions.

(2) For every third year beginning with 2005, the inventory shall also include any other chargeable pollutants and hazardous air pollutants.

(3) For each pollutant specified in Subsection (1) or (2), the inventory shall include the rate and period of emissions, excess or breakdown emissions, startup and shut down emissions, the specific

emissions unit that is the source of the air pollution, composition of air pollutant, type and efficiency of the air pollution control equipment, and other information necessary to quantify operation and emissions and to evaluate pollution control efficiency. The emissions of a pollutant shall be calculated using the source's actual operating hours, production rates, and types of materials processed, stored, or combusted during the inventoried period.

R307-150-6. Sources Identified in Subsection R307-150-3(3).

(1) Each source identified in Subsection R307-150-3(3) shall submit an inventory every third year beginning with calendar year 2002 for emissions units including fugitive ~~[and mobile]~~ emissions.

(a) The inventory shall include PM_{10}, $PM_{2.5}$, oxides of sulfur, oxides of nitrogen, carbon monoxide, volatile organic compounds, ammonia, other chargeable pollutants, and hazardous air pollutants ~~[not exempted in Section R307-150-7]~~.

(b) For each pollutant, the inventory shall include the rate and period of emissions, excess or breakdown emissions, startup and shut down emissions, the specific emissions unit which is the source of the air pollution, composition of air pollutant, type and efficiency of the air pollution control equipment, and other information necessary to quantify operation and emissions and to evaluate pollution control efficiency. The emissions of a pollutant shall be calculated using the source's actual operating hours, production rates, and types of materials processed, stored, or combusted during the inventoried period.

(2) Sources identified in Subsection R307-150-3(3) shall submit an inventory for each year after 2002 in which the total amount of PM_{10}, oxides of sulfur, oxides of nitrogen, carbon monoxide, or volatile organic compounds increases or decreases by 40 tons or more per year from the most recently submitted inventory. For each pollutant, the inventory shall meet the requirements of Subsections R307-150-6(1)(a) and R307-150-6(1)(b).

R307-150-7. Crude Oil and Natural Gas Source Category.

[~~(1)~~]Sources identified in Subsection R307-150-3(4) shall submit an inventory every third year beginning with the 2017 calendar year for emission units. The inventory shall:

[~~(a)~~](1) include the total emissions for PM_{10}, $PM_{2.5}$, oxides of sulfur, oxides of nitrogen, carbon monoxide, and volatile organic compounds for each emission unit at the source and the emissions of a pollutant shall be calculated using the emission unit's actual operating hours, product rates, and types of materials processed, stored, or combusted during the inventoried period;

[~~(b)~~](2) include the type and efficiency of air pollution control equipment; and

[~~(c)~~](3) be submitted in an electronic format determined by the Director specific to this source category.

R307-150-8. Annual Ozone Emission Statement.

(1) Beginning in the year 2021, sources identified in Subsection R307-150-3(5) shall submit an ozone emission statement to the Division of Air Quality annually by April 15 of each year for the previous year's emissions.

(2) A source required to submit an emission statement shall provide the following minimum information:

(a) a certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement;

(b) the physical location where actual emissions occurred;

(c) the name and address of person or entity operating or owning the source;

(d) the nature of the source; and

(e) the total actual emissions of oxides of nitrogen and volatile organic compounds in tons per year for each emission unit.

(3) Emission statements shall be submitted in an electronic format determined by the Director.

KEY: air pollution, reports, inventories
Date of Last Change: 2025
Notice of Continuation: November 1, 2023
Authorizing, and Implemented or Interpreted Law: 19-2-104(1)(c)

ITEM 5

Air Toxics

State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQA-326-25

M E M O R A N D U M

TO: Air Quality Board

FROM: Bryce C. Bird, Executive Secretary

DATE: May 5, 2025

SUBJECT: Air Toxics, Lead-Based Paint, and Asbestos (ATLAS) Section Compliance Activities – April 2025

Asbestos Demolition/Renovation NESHAP Inspections	8
Asbestos AHERA Inspections	8
Asbestos State Rules Only Inspections	4
Asbestos Notification Forms Accepted	199
Asbestos Telephone Calls	417
Asbestos Individuals Certifications Approved	72
Asbestos Company Certifications	11
Asbestos Alternate Work Practices Approved	4
Lead-Based Paint (LBP) Inspections	0
LBP Notification Forms Approved	0
LBP Telephone Calls	57
LBP Letters Prepared and Mailed	9
LBP Courses Reviewed/Approved	0
LBP Course Audits	2
LBP Individual Certifications Approved	21

LBP Firm Certifications	8
Notices of Violation Sent	0
Compliance Advisories Sent	13
Warning Letters Sent	5
Settlement Agreements Finalized	0

Compliance

State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQC-428-25

M E M O R A N D U M

TO: Air Quality Board

FROM: Bryce C. Bird, Executive Secretary

DATE: May 6, 2025

SUBJECT: Compliance Activities – April 2025

ACTIVITIES:

Activity	Monthly Total	36-Month Average
Inspections	56	64
On-Site Stack Test & CEM Audits	6	5
Stack Test & RATA Report Reviews	37	38
Emission Report Reviews	28	21
Temporary Relocation Request Reviews	7	6
Fugitive Dust Control Plan Reviews	148	118
Soil Remediation Report Reviews	1	2
Open Burn Permits Issued	3,179	692
Miscellaneous Inspections[1]	18	17
Complaints Received	44	21
Wood Burning Complaints Received	0	3
Breakdown Reports Received	0	1
Compliance Actions Resulting from a Breakdown	0	0
VOC Inspections (Gas station vapor recovery)	0	0
Warning Letters Issued	2	2
Notices of Violation Issued	0	0
Compliance Advisories Issued	1	6
No Further Action Letters Issued	2	2
Settlement Agreements Reached	2	2
Penalties Assessed	$14,918	$93,566.96

[1]Miscellaneous inspections include, e.g., surveillance, complaint, on-site training, dust patrol, smoke patrol, open burning, etc.

SETTLEMENT AGREEMENTS:

Party	Amount
NOVVA, Inc.	$10,838
Uinta Wax Operating	$4,080

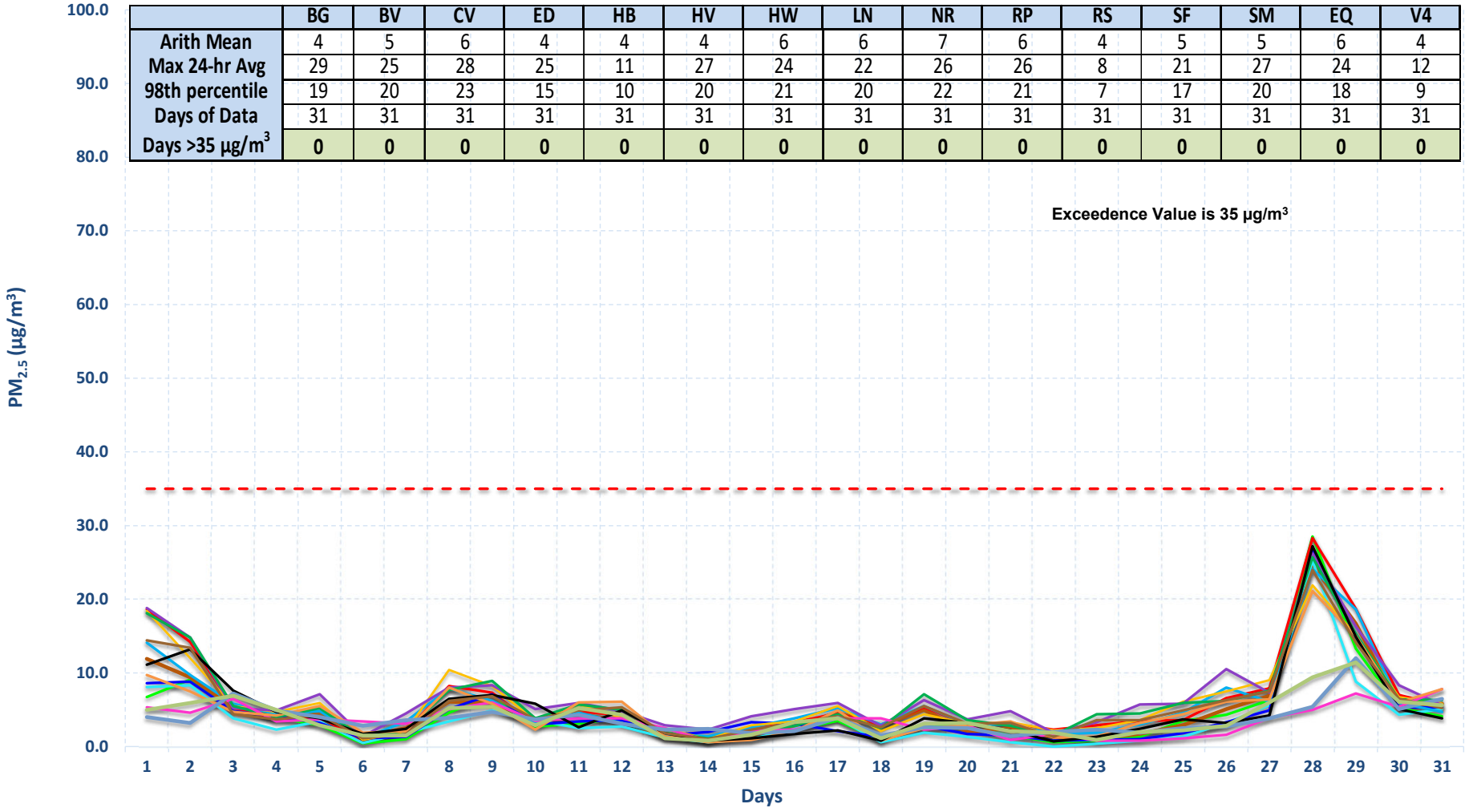
UNRESOLVED NOTICES OF VIOLATION:

Party	Date Issued
Citation Oil and Gas (in administrative litigation)	01/15/2020
Ovintiv Production Inc.	07/14/2020
Uinta Wax Operating (formerly CH4 Finley)	07/24/2020
Finley Resources	09/15/2022
Holcim	12/19/2023
Holcim	03/27/2024
Big West Oil	07/19/2024
Holcim	08/02/2024
Big West Oil	10/01/2024
CKC Operations, LLC	02/18/2025
Green Natural Gas Ventures, LLC – Lisbon Valley	02/24/2025

Monitoring

Utah 24-Hr $PM_{2.5}$ Data March 2025

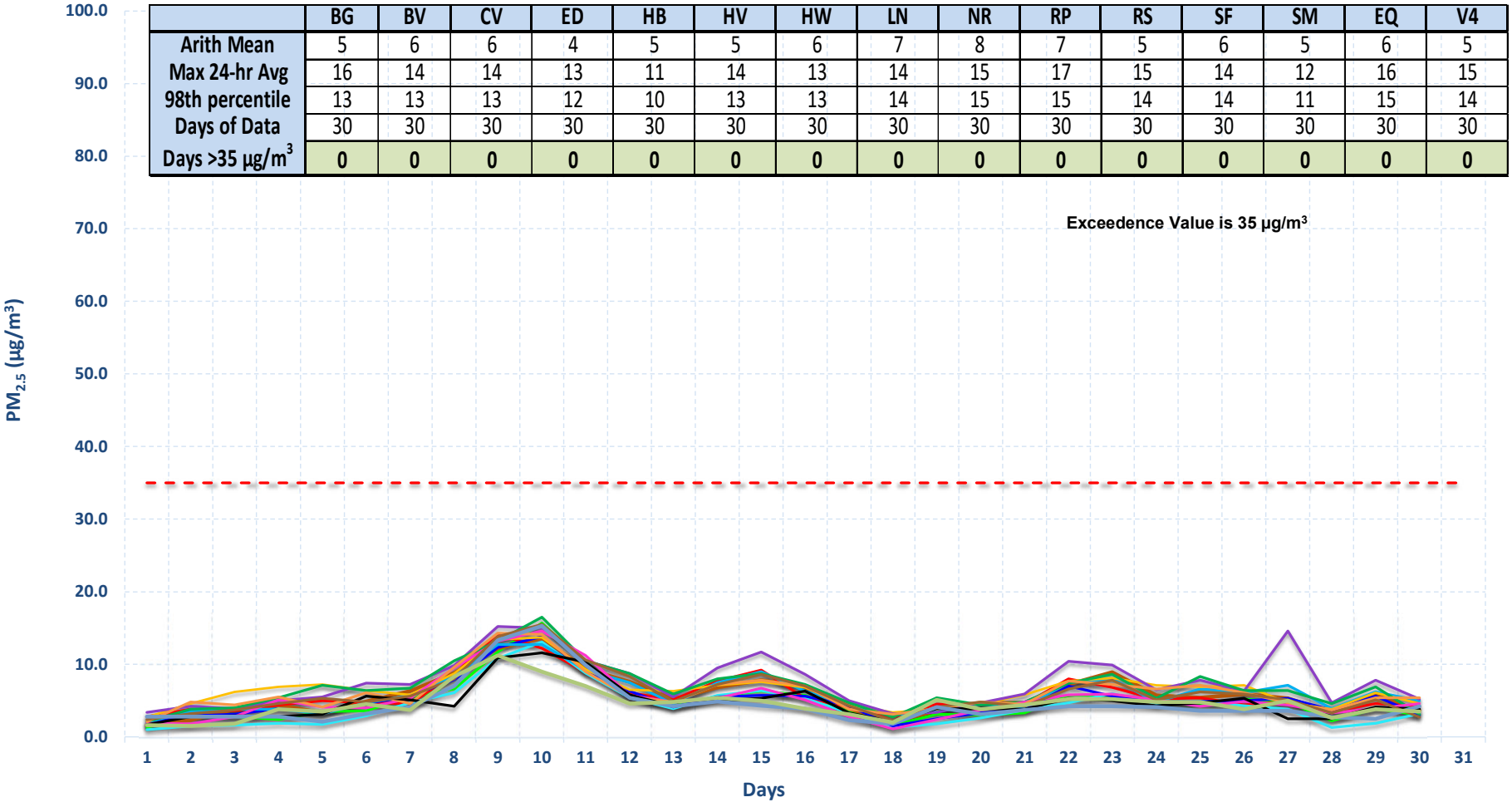
	BG	BV	CV	ED	HB	HV	HW	LN	NR	RP	RS	SF	SM	EQ	V4
Arith Mean	4	5	6	4	4	4	6	6	7	6	4	5	5	6	4
Max 24-hr Avg	29	25	28	25	11	27	24	22	26	26	8	21	27	24	12
98th percentile	19	20	23	15	10	20	21	20	22	21	7	17	20	18	9
Days of Data	31	31	31	31	31	31	31	31	31	31	31	31	31	31	31
Days >35 µg/m^3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)

Utah 24-Hr $PM_{2.5}$ Data April 2025

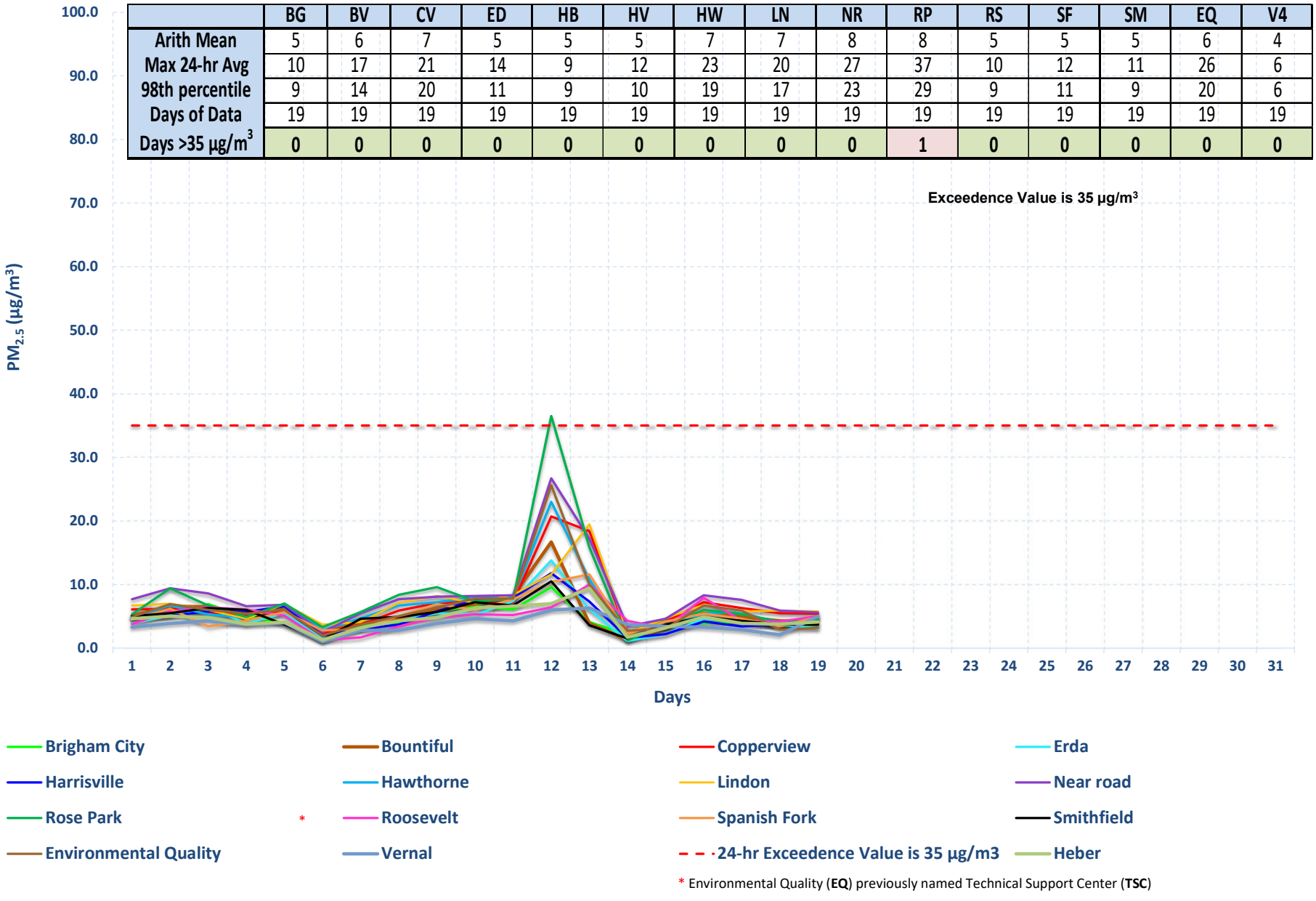
	BG	BV	CV	ED	HB	HV	HW	LN	NR	RP	RS	SF	SM	EQ	V4
Arith Mean	5	6	6	4	5	5	6	7	8	7	5	6	5	6	5
Max 24-hr Avg	16	14	14	13	11	14	13	14	15	17	15	14	12	16	15
98th percentile	13	13	13	12	10	13	13	14	15	15	14	14	11	15	14
Days of Data	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30
Days >35 µg/m^3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)

Utah 24-Hr $PM_{2.5}$ Data May 2025

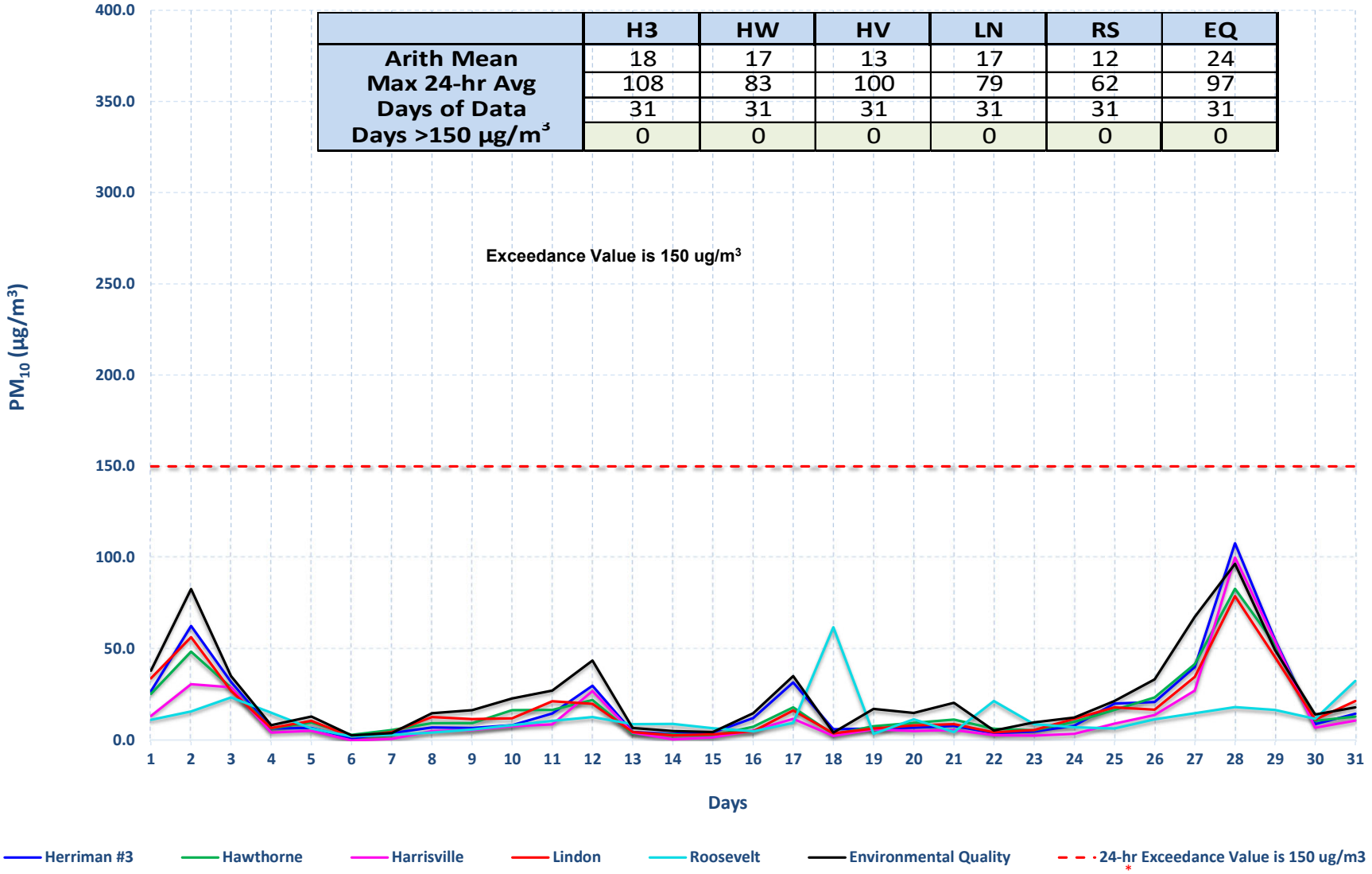
	BG	BV	CV	ED	HB	HV	HW	LN	NR	RP	RS	SF	SM	EQ	V4
Arith Mean	5	6	7	5	5	5	7	7	8	8	5	5	5	6	4
Max 24-hr Avg	10	17	21	14	9	12	23	20	27	37	10	12	11	26	6
98th percentile	9	14	20	11	9	10	19	17	23	29	9	11	9	20	6
Days of Data	19	19	19	19	19	19	19	19	19	19	19	19	19	19	19
Days >35 µg/m^3	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)

Utah 24-hr PM_{10} Data March 2025

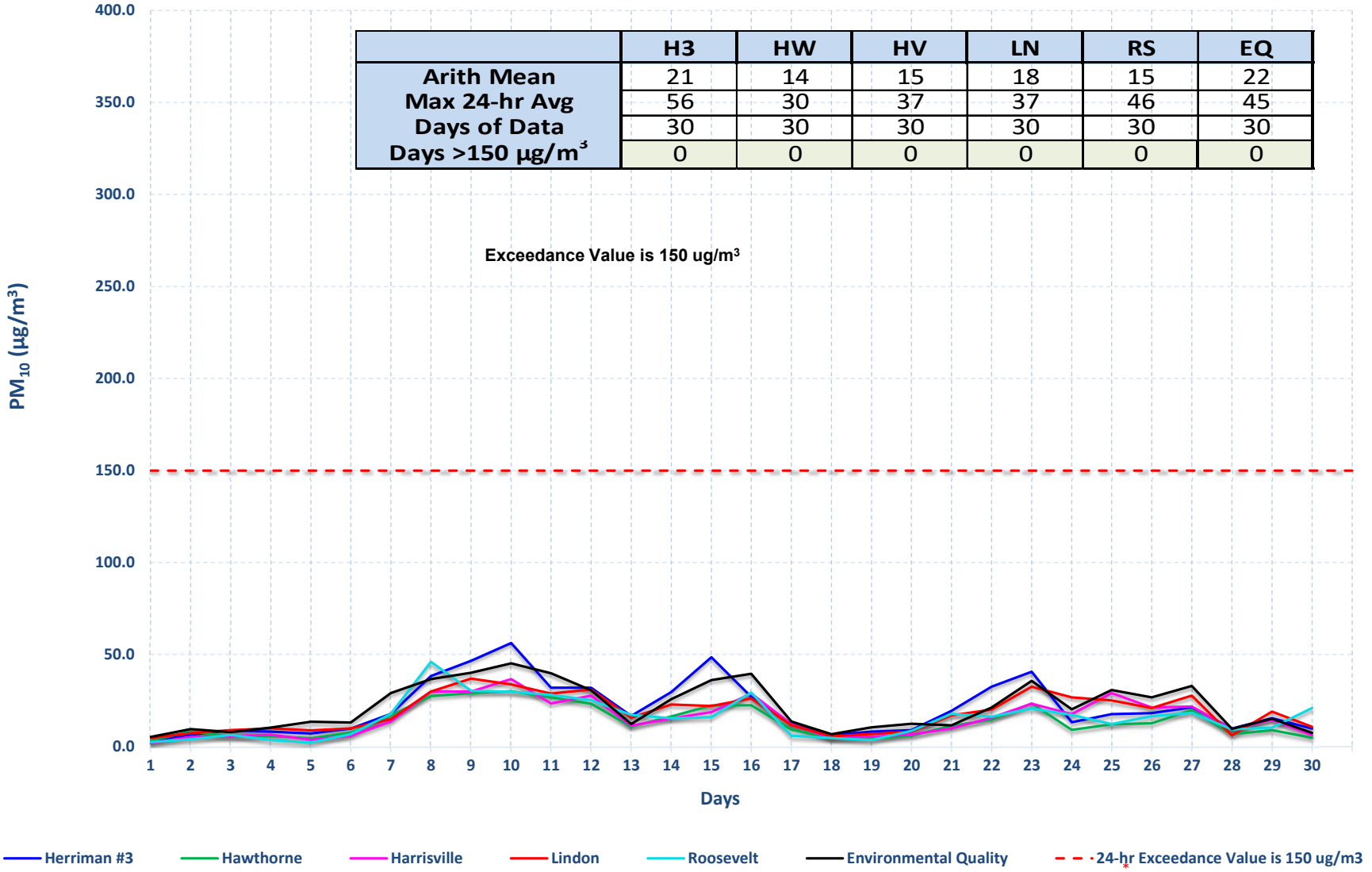
	H3	HW	HV	LN	RS	EQ
Arith Mean	18	17	13	17	12	24
Max 24-hr Avg	108	83	100	79	62	97
Days of Data	31	31	31	31	31	31
Days >150 µg/m³	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)

Utah 24-hr PM_{10} Data April 2025

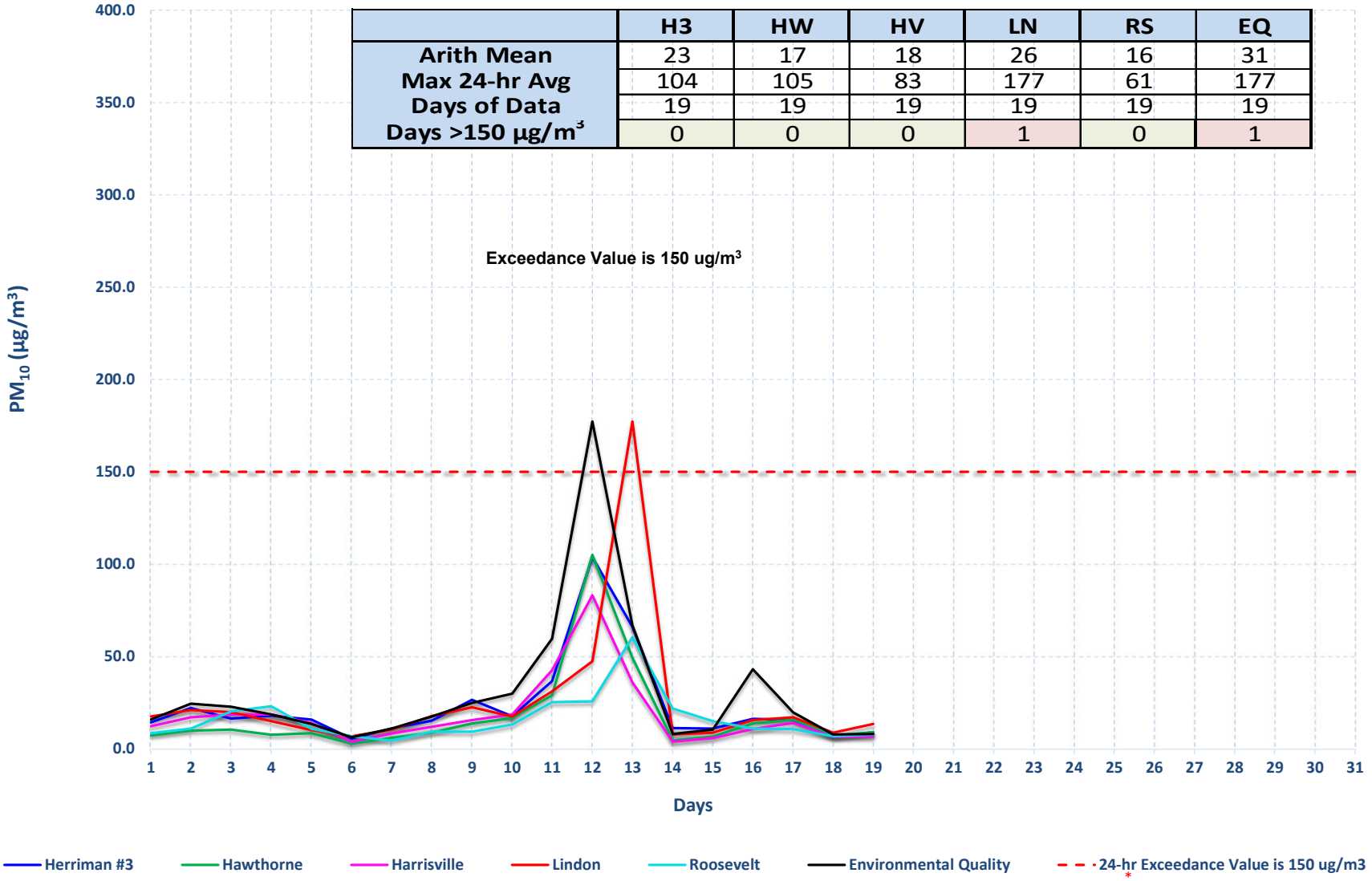
	H3	HW	HV	LN	RS	EQ
Arith Mean	21	14	15	18	15	22
Max 24-hr Avg	56	30	37	37	46	45
Days of Data	30	30	30	30	30	30
Days >150 µg/m³	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)

Utah 24-hr PM_{10} Data May 2025

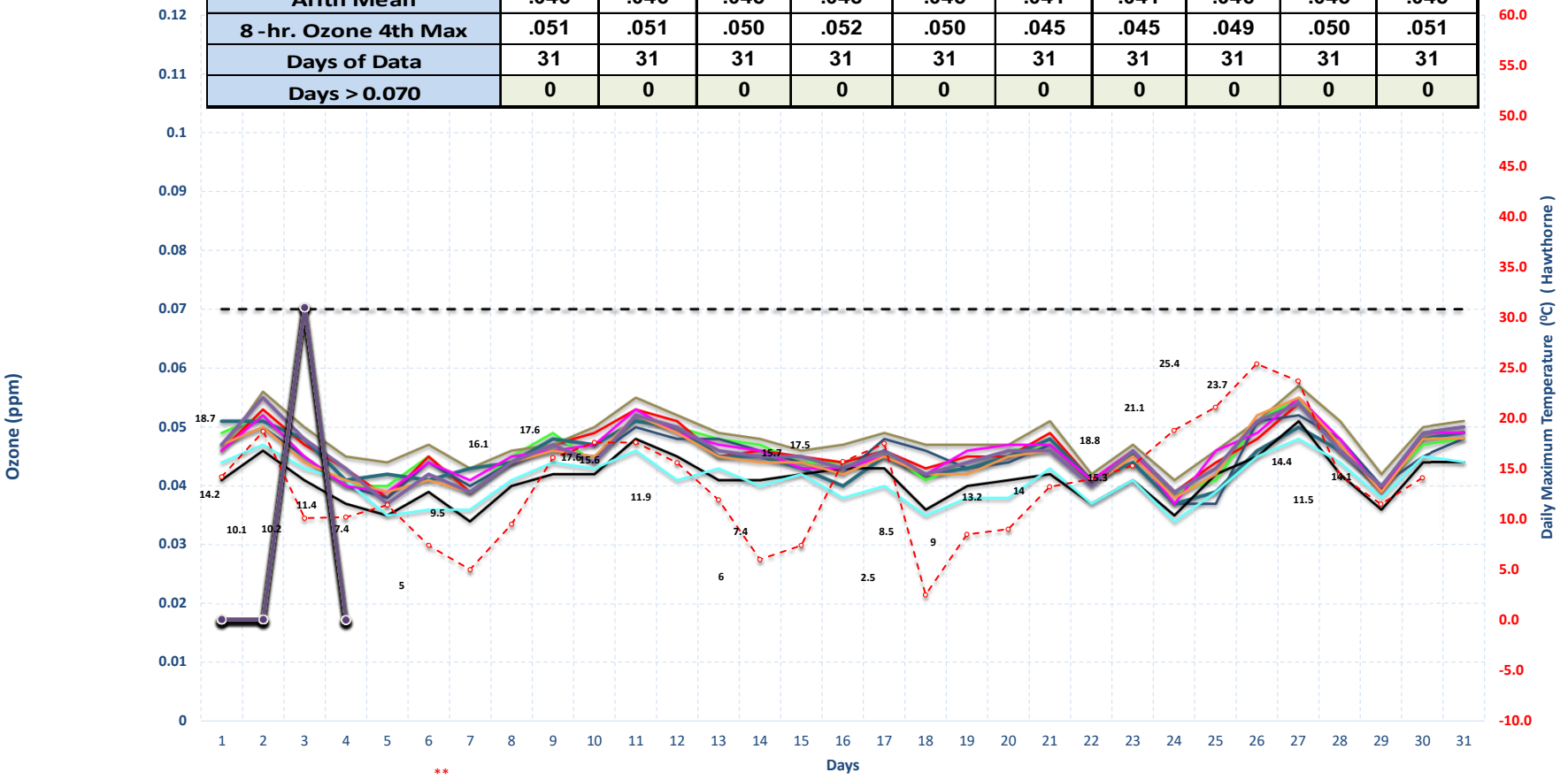
	H3	HW	HV	LN	RS	EQ
Arith Mean	23	17	18	26	16	31
Max 24-hr Avg	104	105	83	177	61	177
Days of Data	19	19	19	19	19	19
Days >150 µg/m³	0	0	0	1	0	1



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)

Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

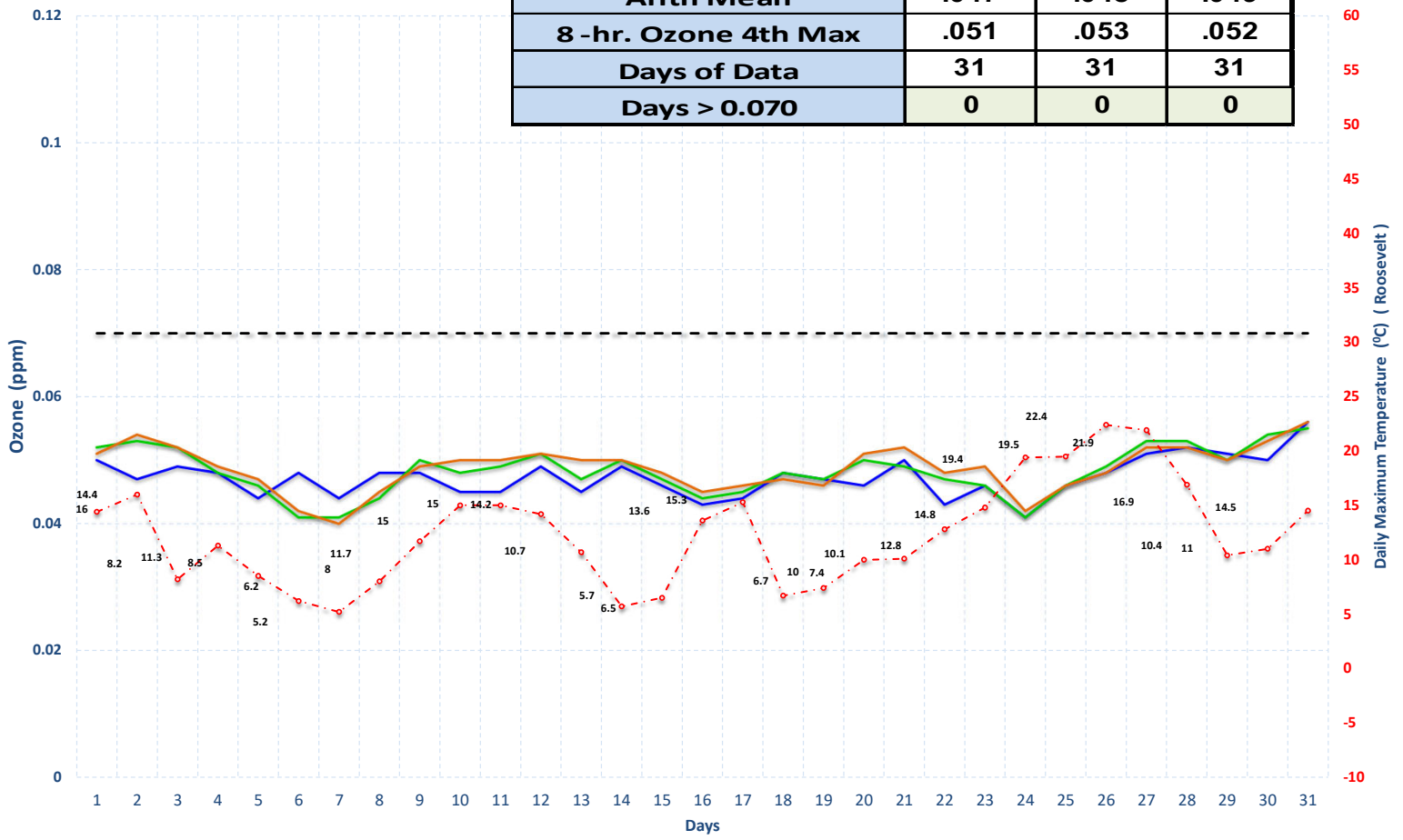
O3 March 2025	BV	CV	ED	H3	HV	HW	NR	RB	RP	EQ
Arith Mean	.046	.046	.045	.048	.045	.041	.041	.046	.045	.045
8-hr. Ozone 4th Max	.051	.051	.050	.052	.050	.045	.045	.049	.050	.051
Days of Data	31	31	31	31	31	31	31	31	31	31
Days > 0.070	0	0	0	0	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)
** Controlling Monitor

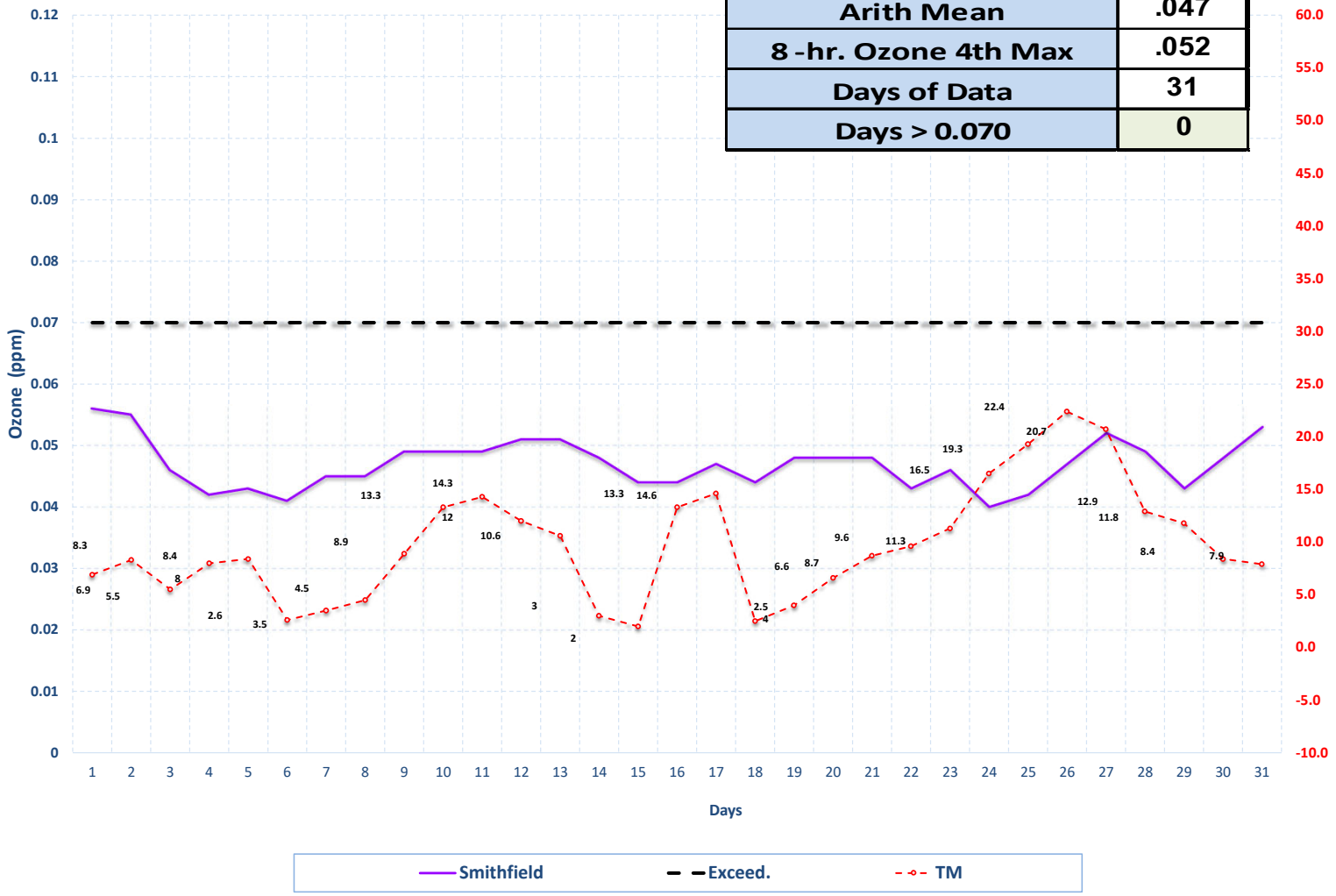
Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

	P2	RS	V4
Arith Mean	.047	.048	.049
8 -hr. Ozone 4th Max	.051	.053	.052
Days of Data	31	31	31
Days > 0.070	0	0	0



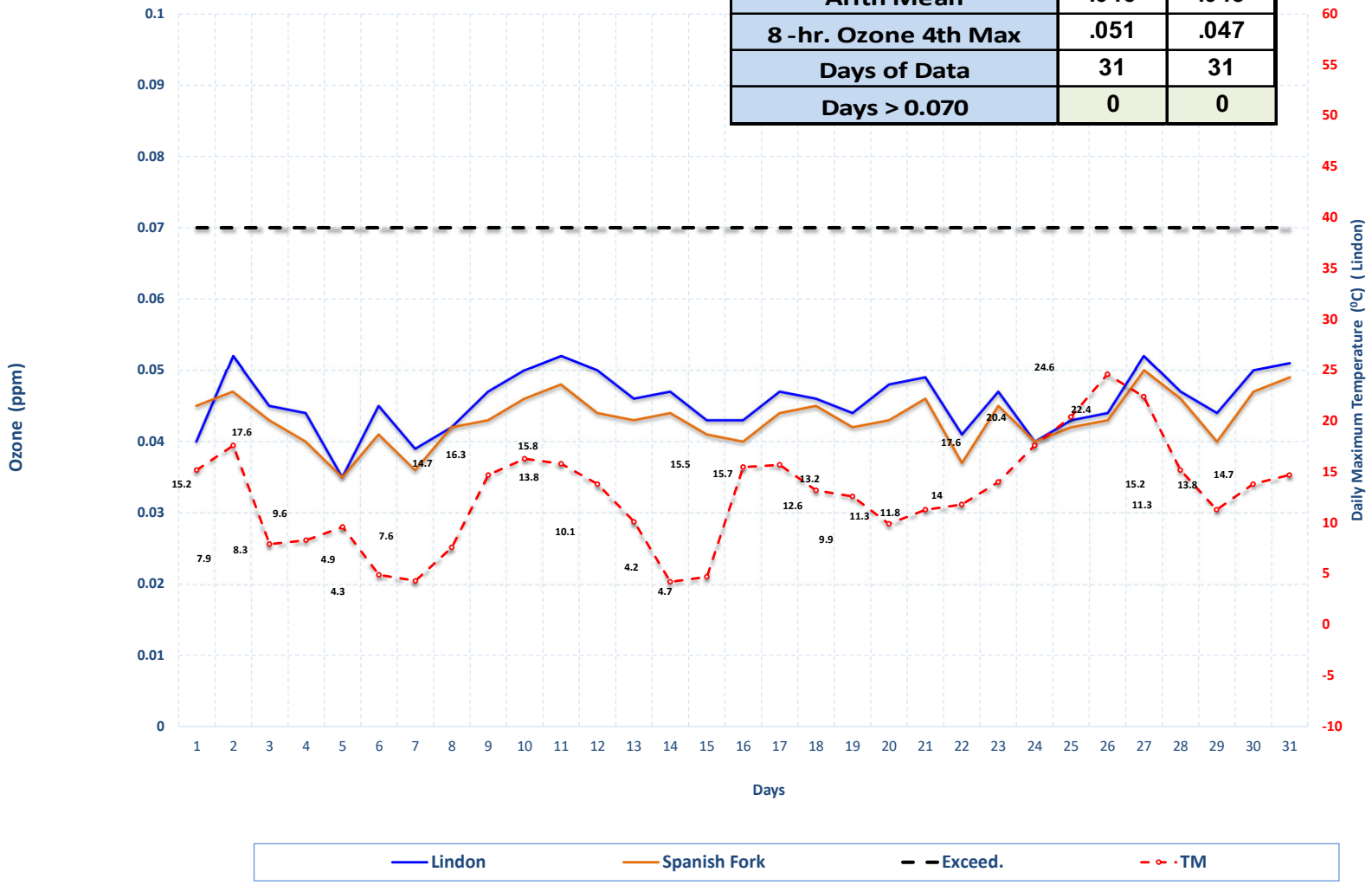
Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

	SM
Arith Mean	.047
8 -hr. Ozone 4th Max	.052
Days of Data	31
Days > 0.070	0



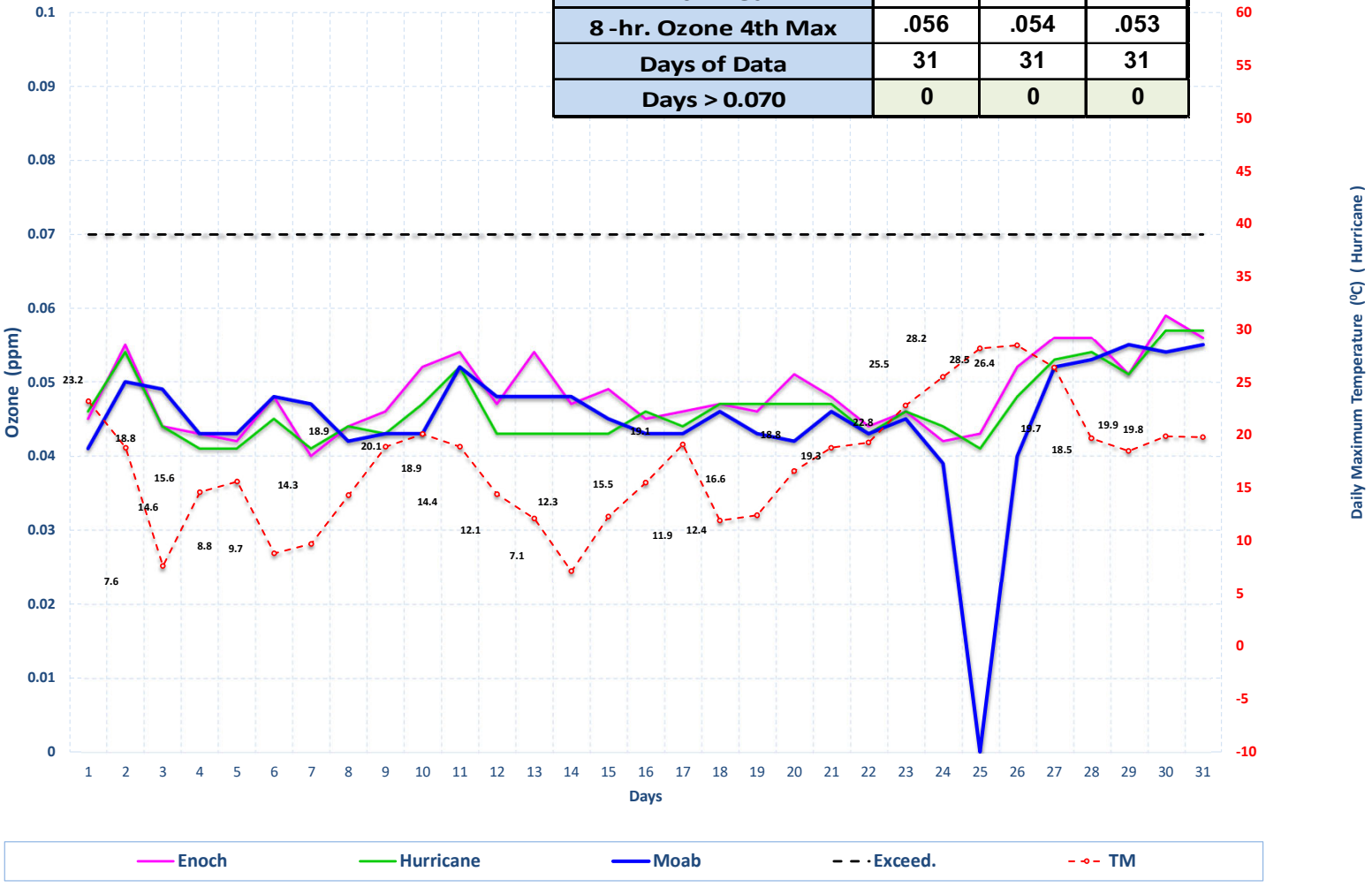
Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

	LN	SF
Arith Mean	.046	.043
8 -hr. Ozone 4th Max	.051	.047
Days of Data	31	31
Days > 0.070	0	0



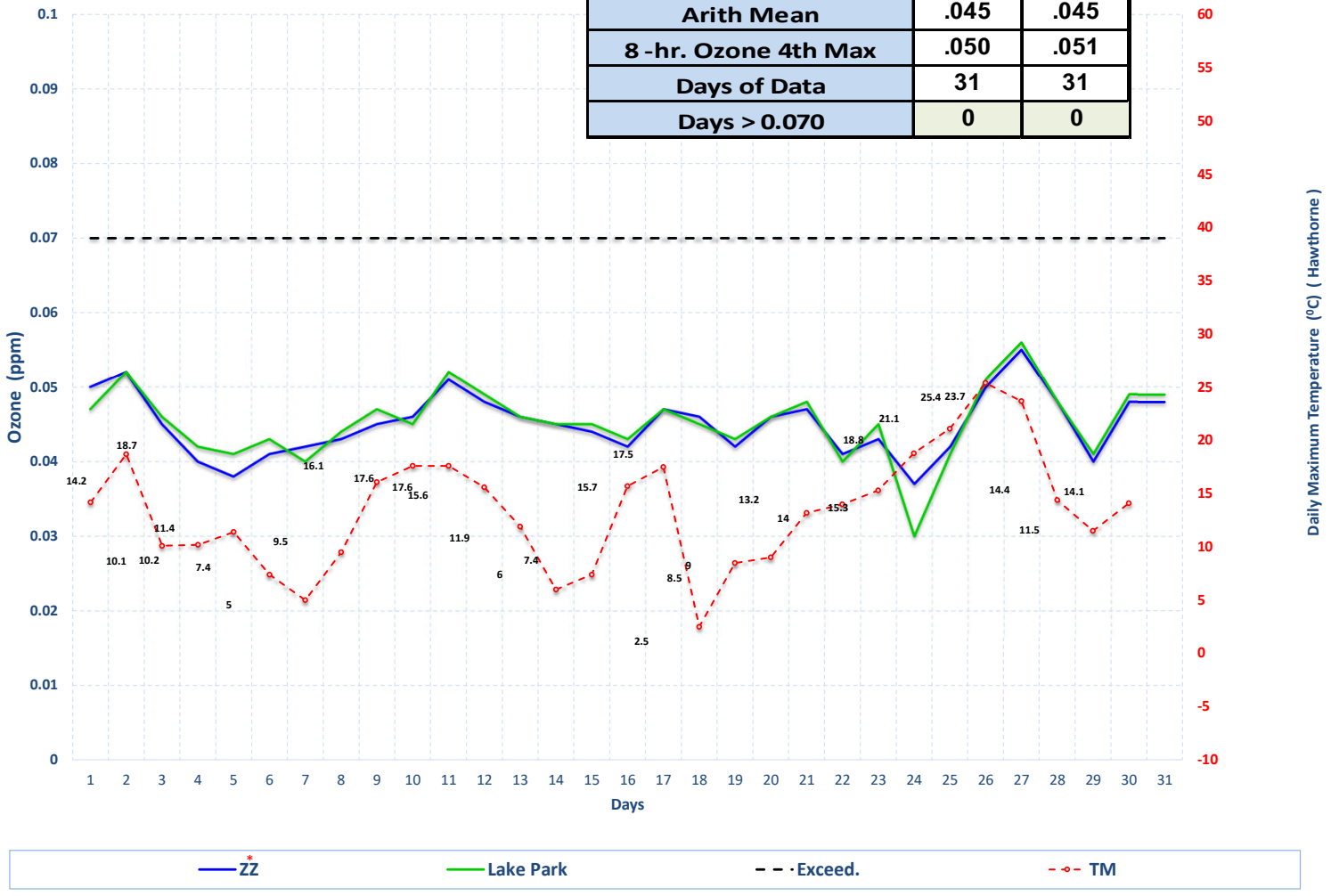
Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

	EN	HC	M7
Arith Mean	.048	.047	.045
8 -hr. Ozone 4th Max	.056	.054	.053
Days of Data	31	31	31
Days > 0.070	0	0	0



Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025
Stations Monitoring the Inland Port Development

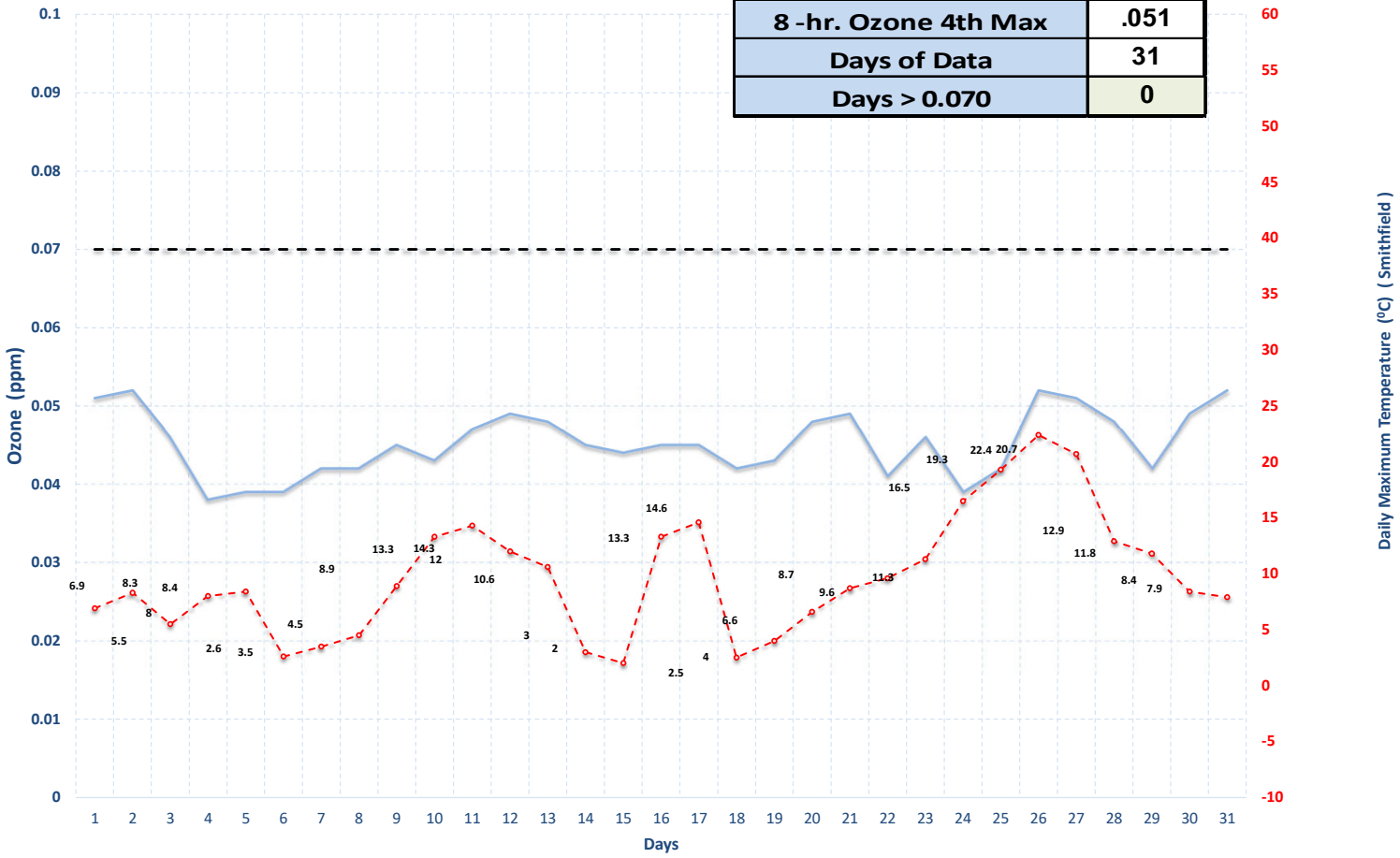
	ZZ	LP
Arith Mean	.045	.045
8 -hr. Ozone 4th Max	.050	.051
Days of Data	31	31
Days > 0.070	0	0



* **ZZ** is located at the New Utah State Prison (1480 North 8000 West, SLC).
This site was previously named **IP**

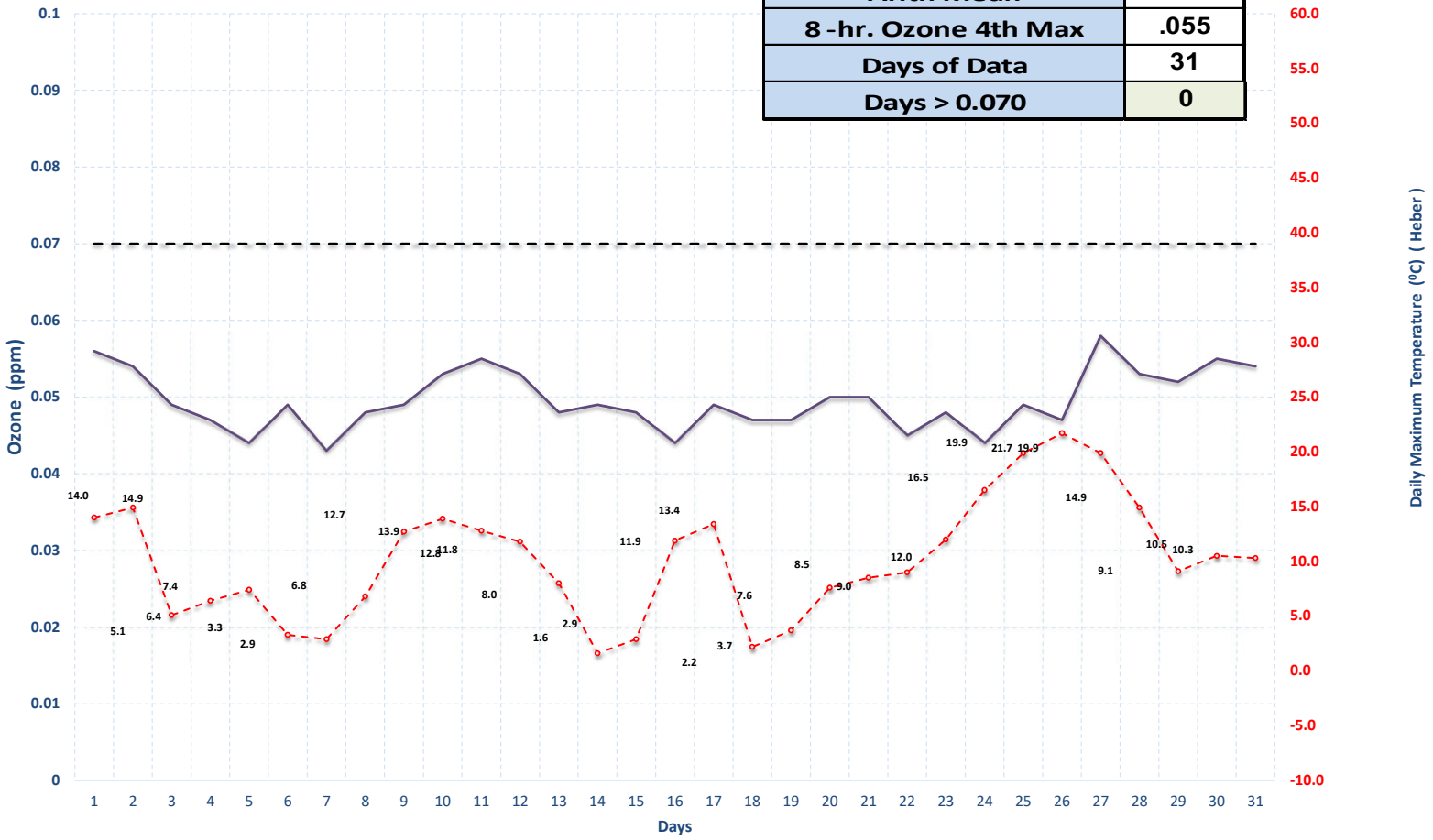
Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

	BG
Arith Mean	.045
8 -hr. Ozone 4th Max	.051
Days of Data	31
Days > 0.070	0



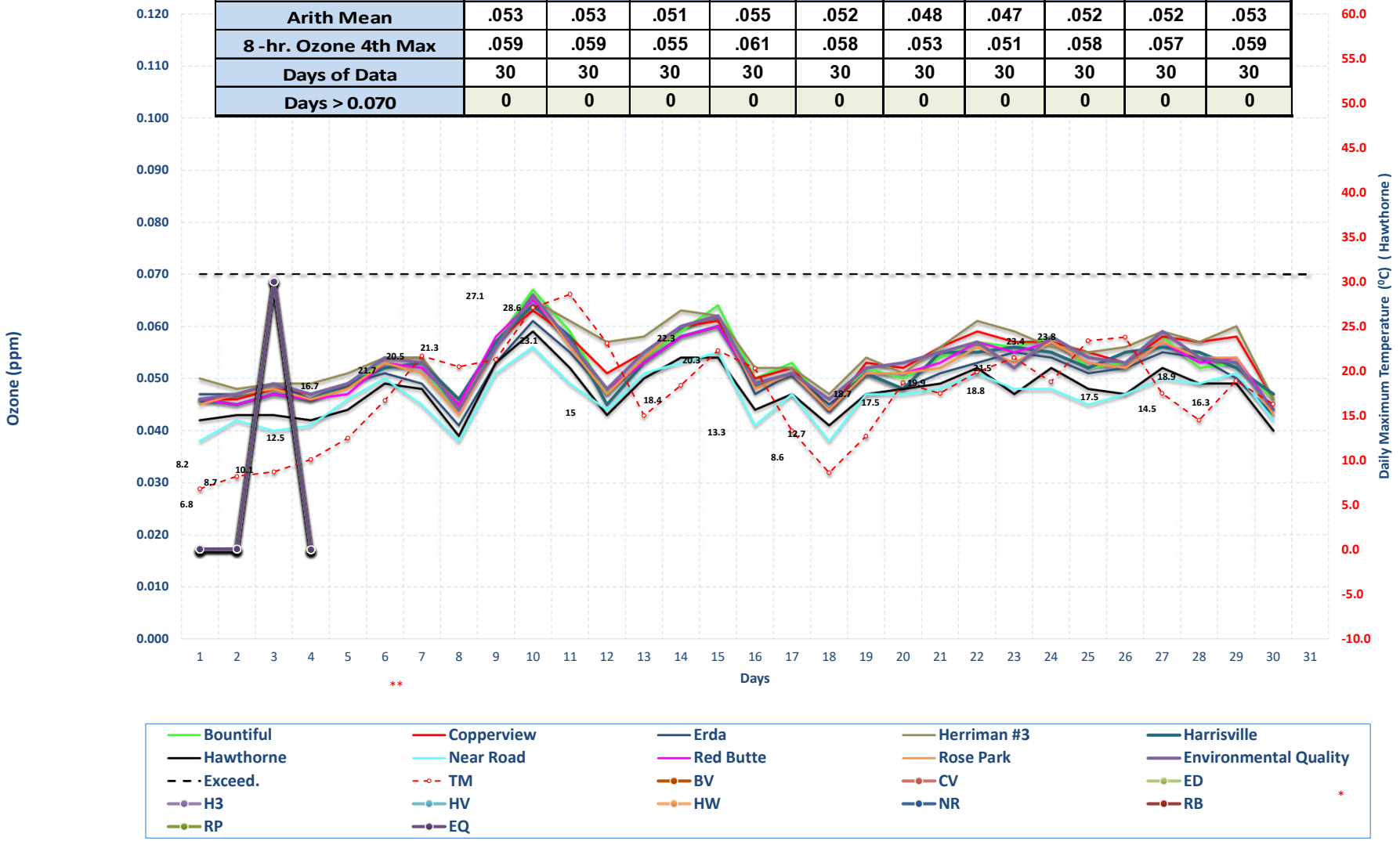
Highest 8-hr Ozone Concentration & Daily Maximum Temperature March 2025

	HB
Arith Mean	.050
8 -hr. Ozone 4th Max	.055
Days of Data	31
Days > 0.070	0



Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

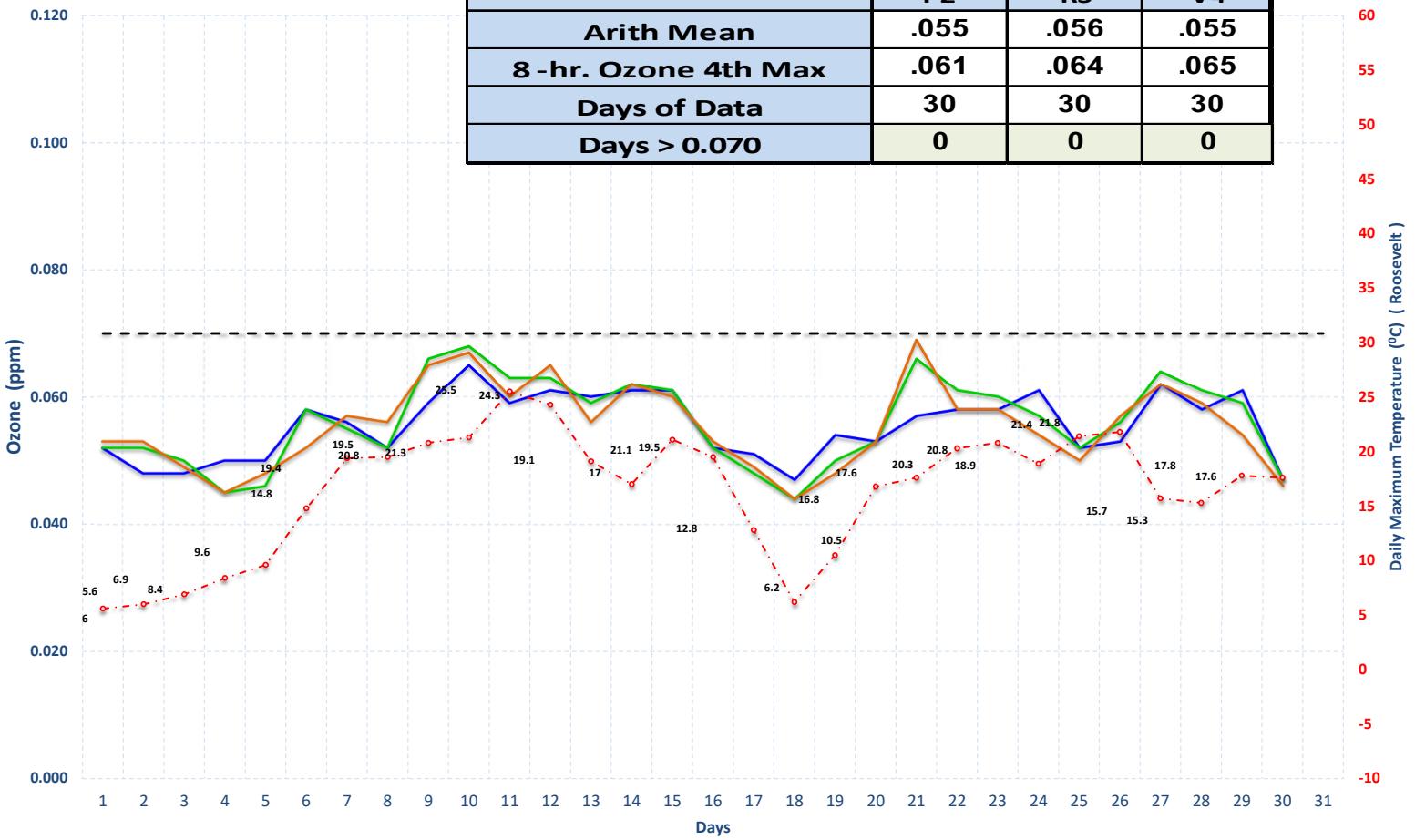
O3 March 2025	BV	CV	ED	H3	HV	HW	NR	RB	RP	EQ
Arith Mean	.053	.053	.051	.055	.052	.048	.047	.052	.052	.053
8 -hr. Ozone 4th Max	.059	.059	.055	.061	.058	.053	.051	.058	.057	.059
Days of Data	30	30	30	30	30	30	30	30	30	30
Days > 0.070	0	0	0	0	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)
** Controlling Monitor

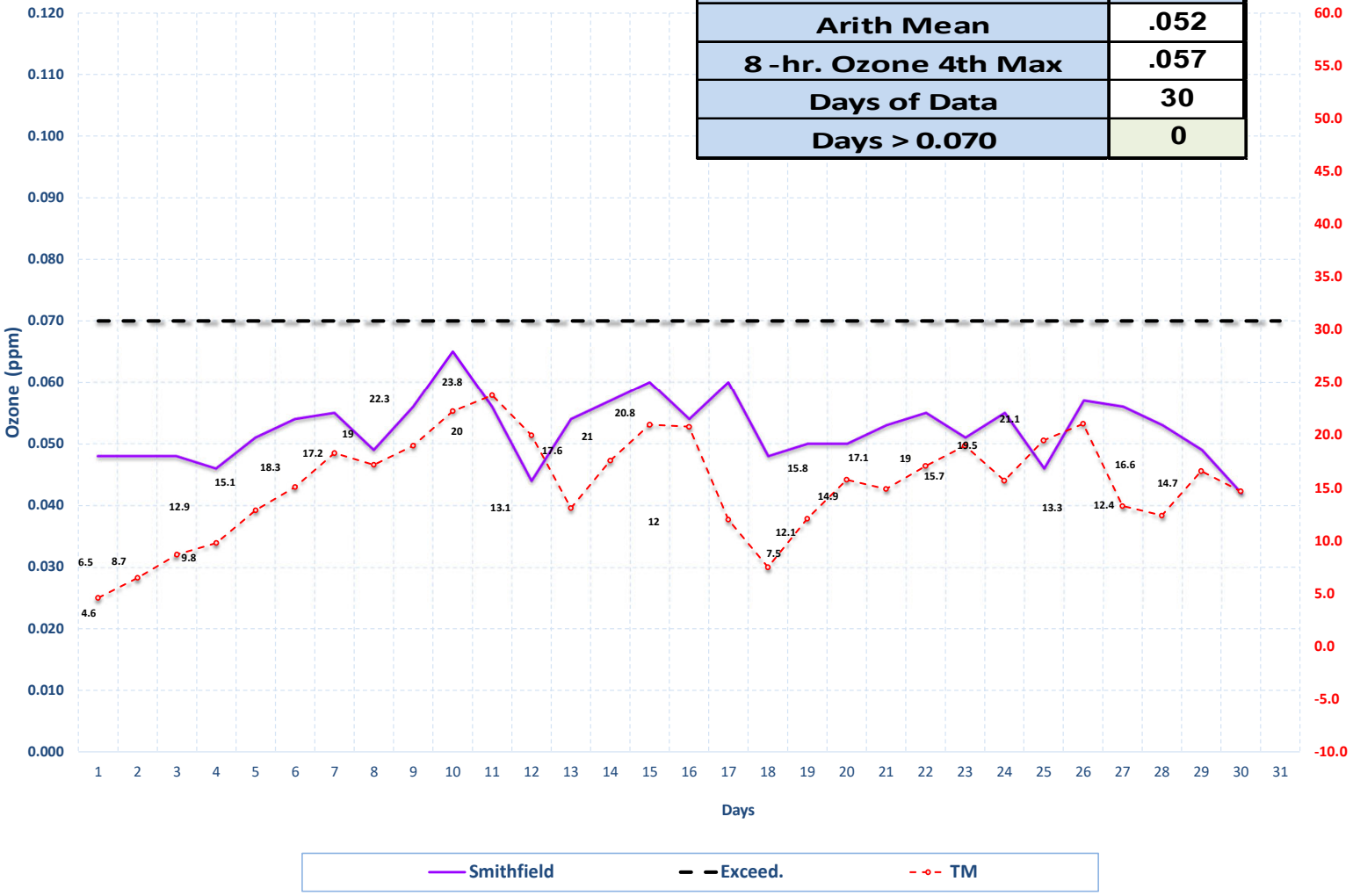
Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

	P2	RS	V4
Arith Mean	.055	.056	.055
8 -hr. Ozone 4th Max	.061	.064	.065
Days of Data	30	30	30
Days > 0.070	0	0	0



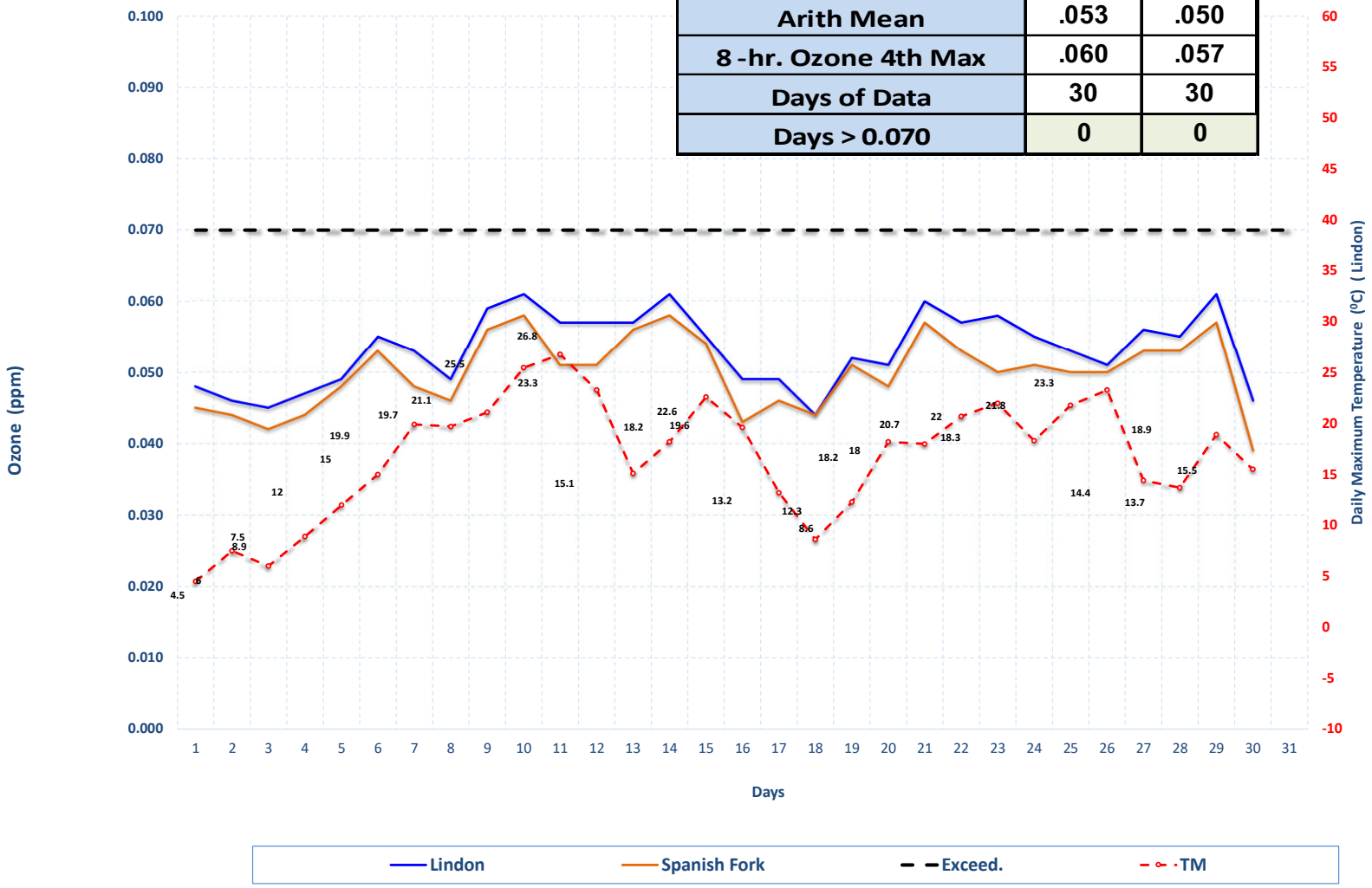
Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

	SM
Arith Mean	.052
8 -hr. Ozone 4th Max	.057
Days of Data	30
Days > 0.070	0



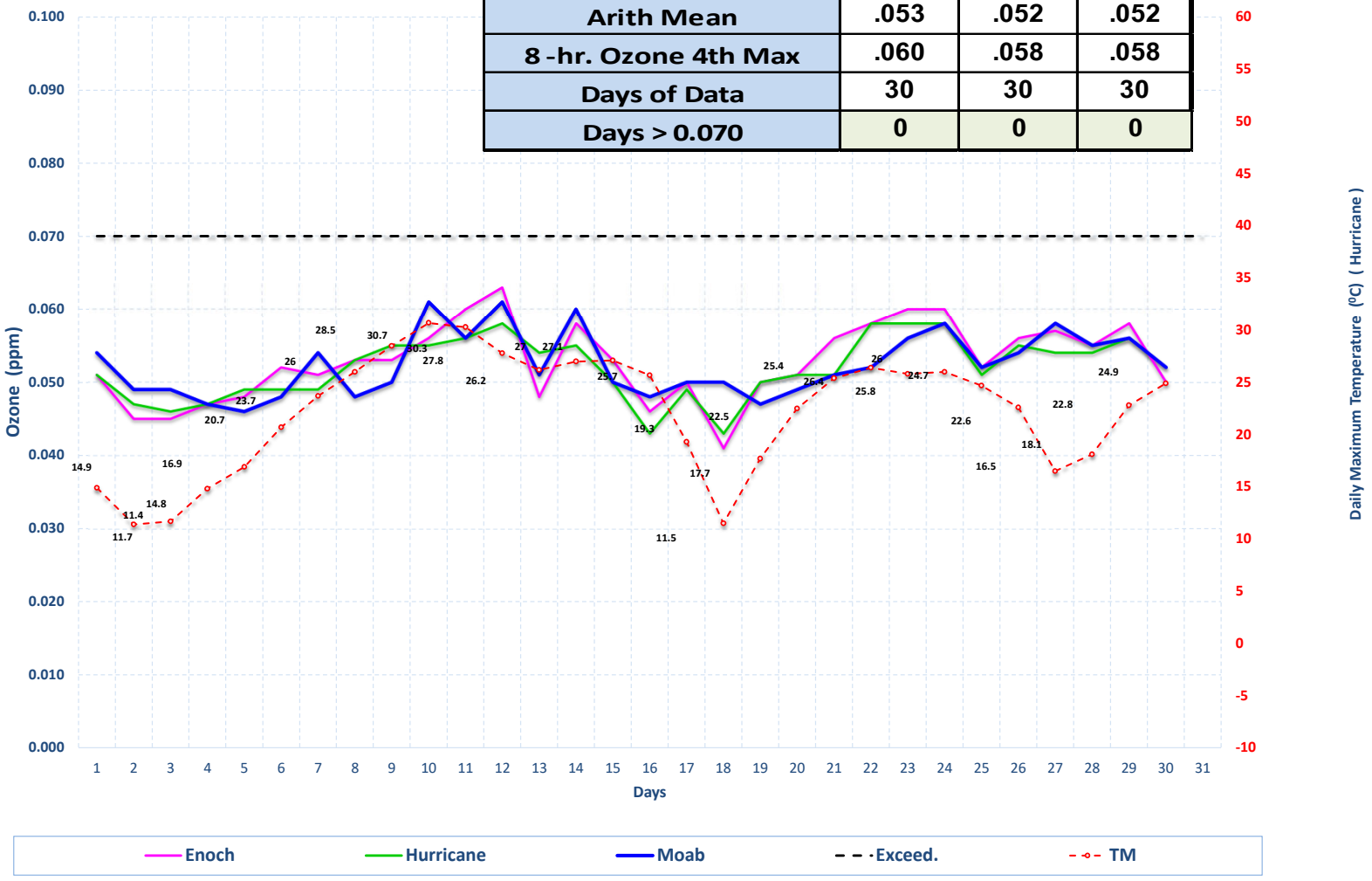
Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

	LN	SF
Arith Mean	.053	.050
8 -hr. Ozone 4th Max	.060	.057
Days of Data	30	30
Days > 0.070	0	0



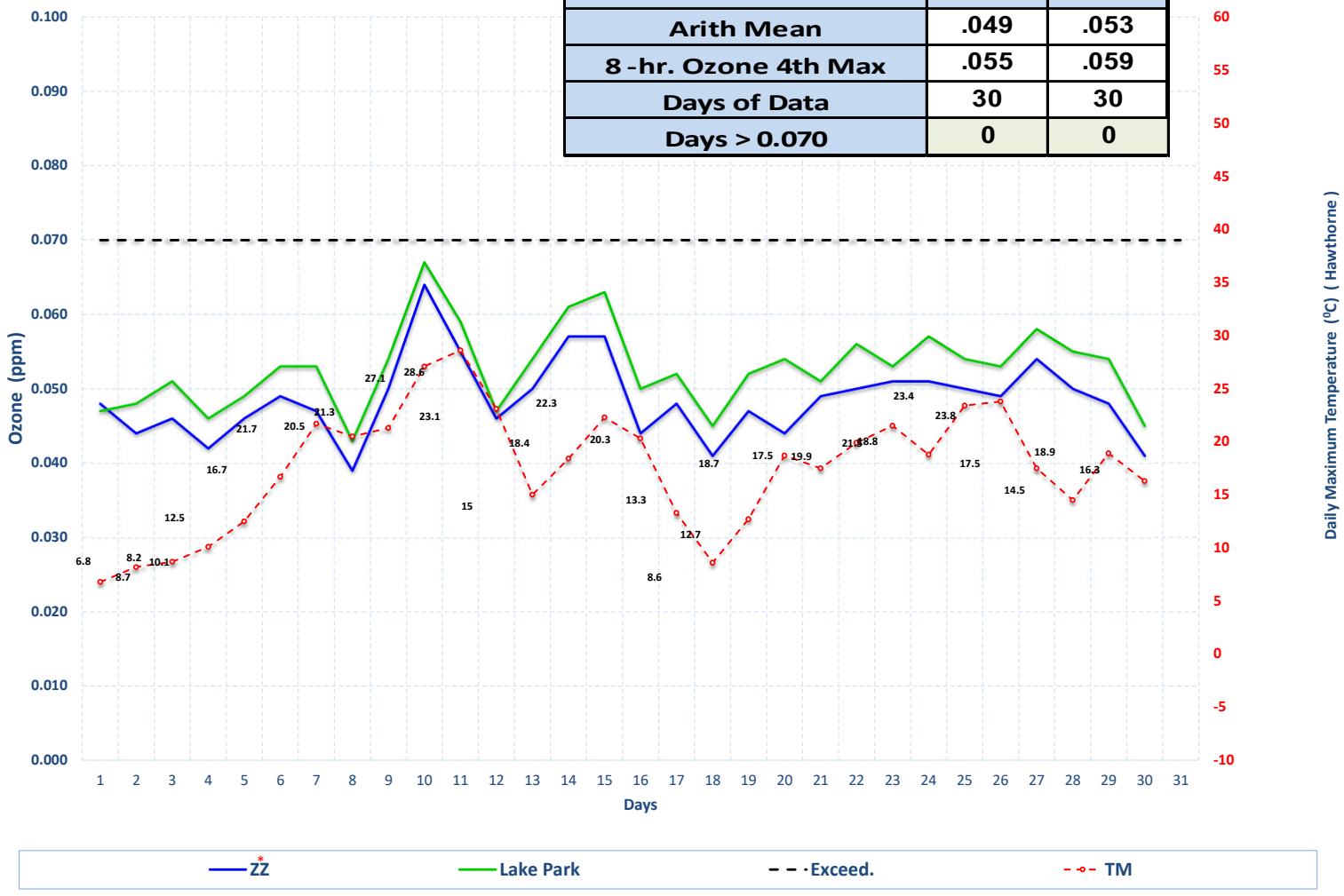
Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

	EN	HC	M7
Arith Mean	.053	.052	.052
8 -hr. Ozone 4th Max	.060	.058	.058
Days of Data	30	30	30
Days > 0.070	0	0	0



Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025
Stations Monitoring the Inland Port Development

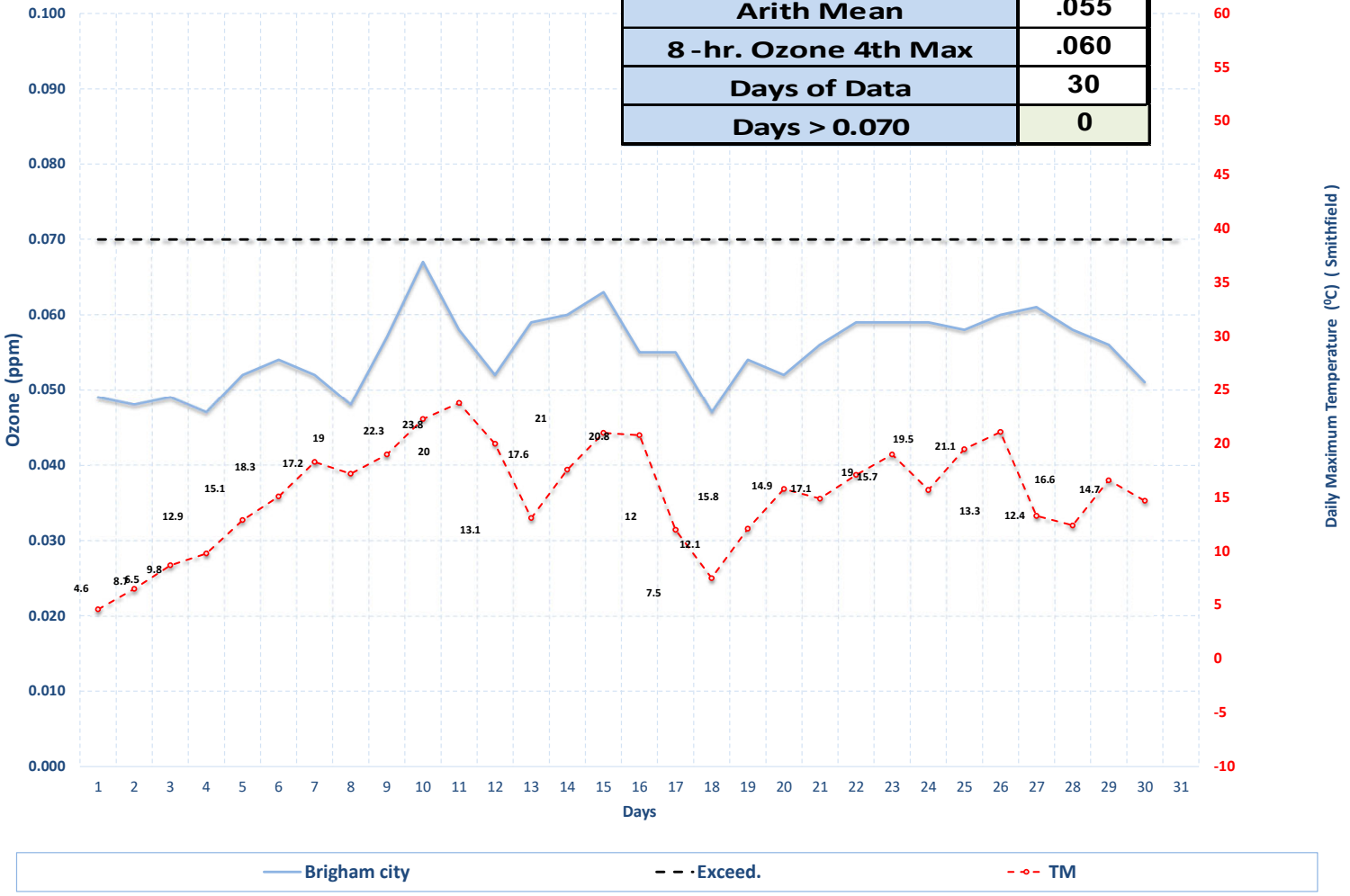
	ZZ	LP
Arith Mean	.049	.053
8 -hr. Ozone 4th Max	.055	.059
Days of Data	30	30
Days > 0.070	0	0



* **ZZ** is located at the New Utah State Prison (1480 North 8000 West, SLC).
This site was previously named **IP**

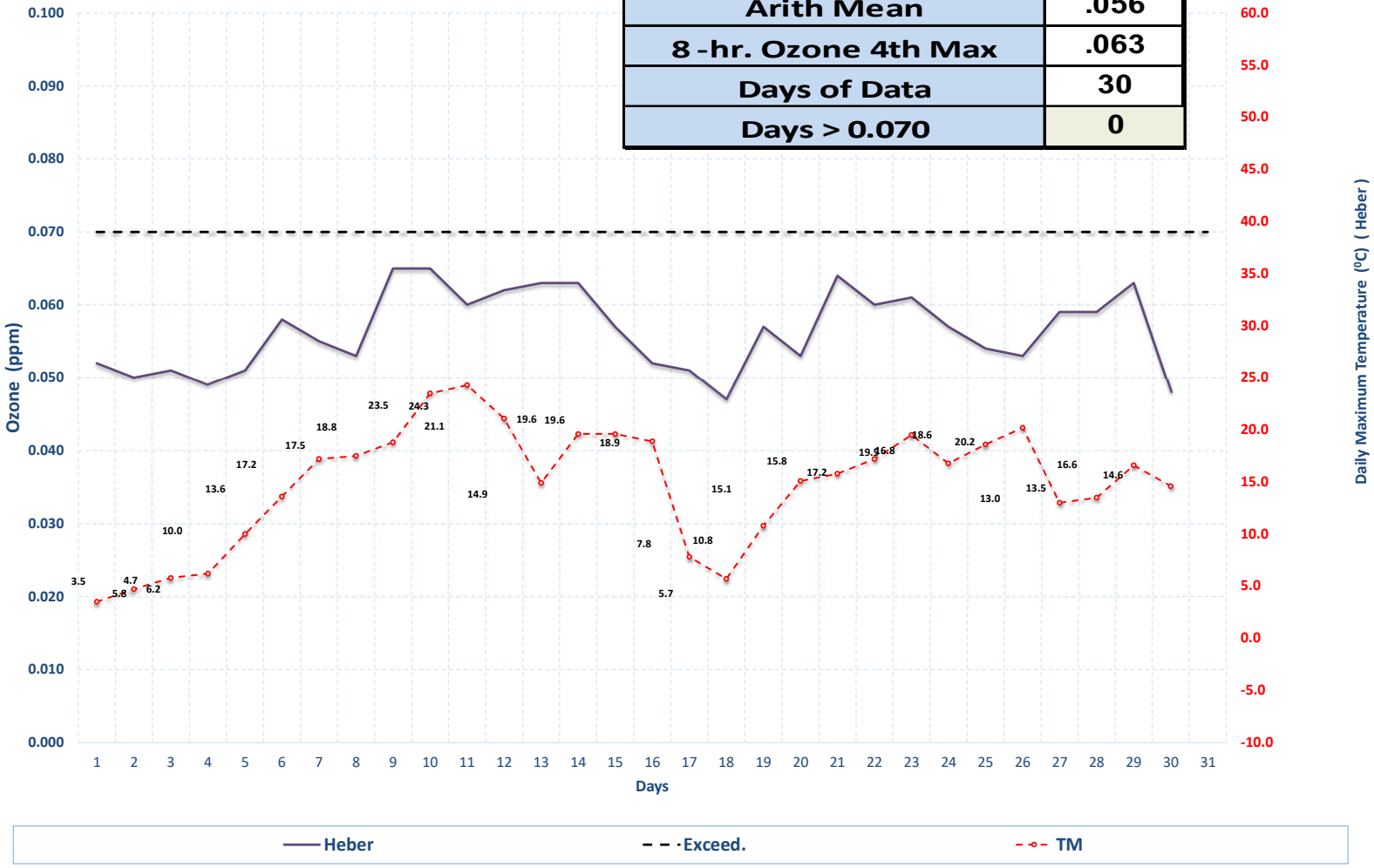
Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

	BG
Arith Mean	.055
8 -hr. Ozone 4th Max	.060
Days of Data	30
Days > 0.070	0



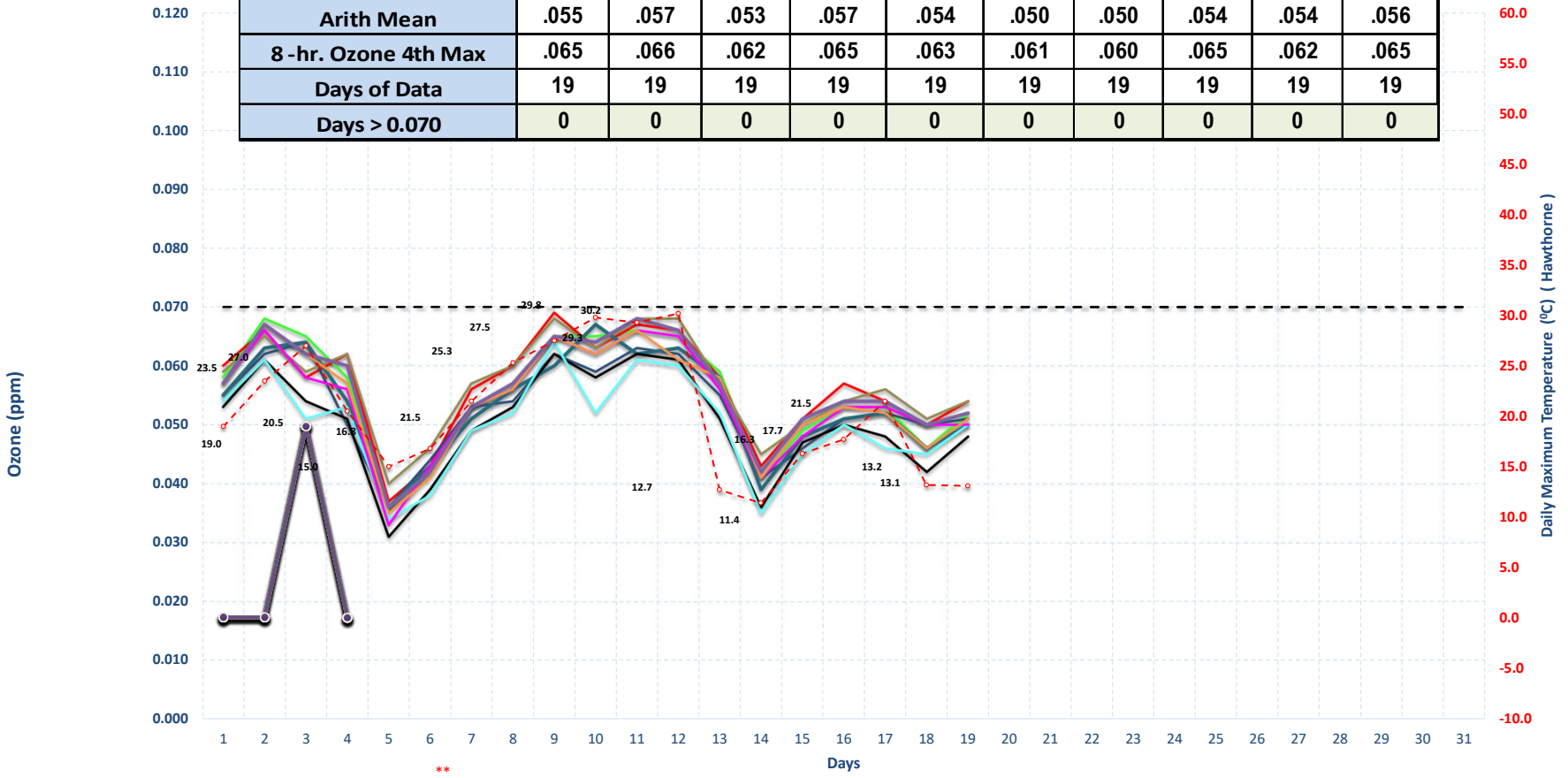
Highest 8-hr Ozone Concentration & Daily Maximum Temperature April 2025

	HB
Arith Mean	.056
8 -hr. Ozone 4th Max	.063
Days of Data	30
Days > 0.070	0



Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

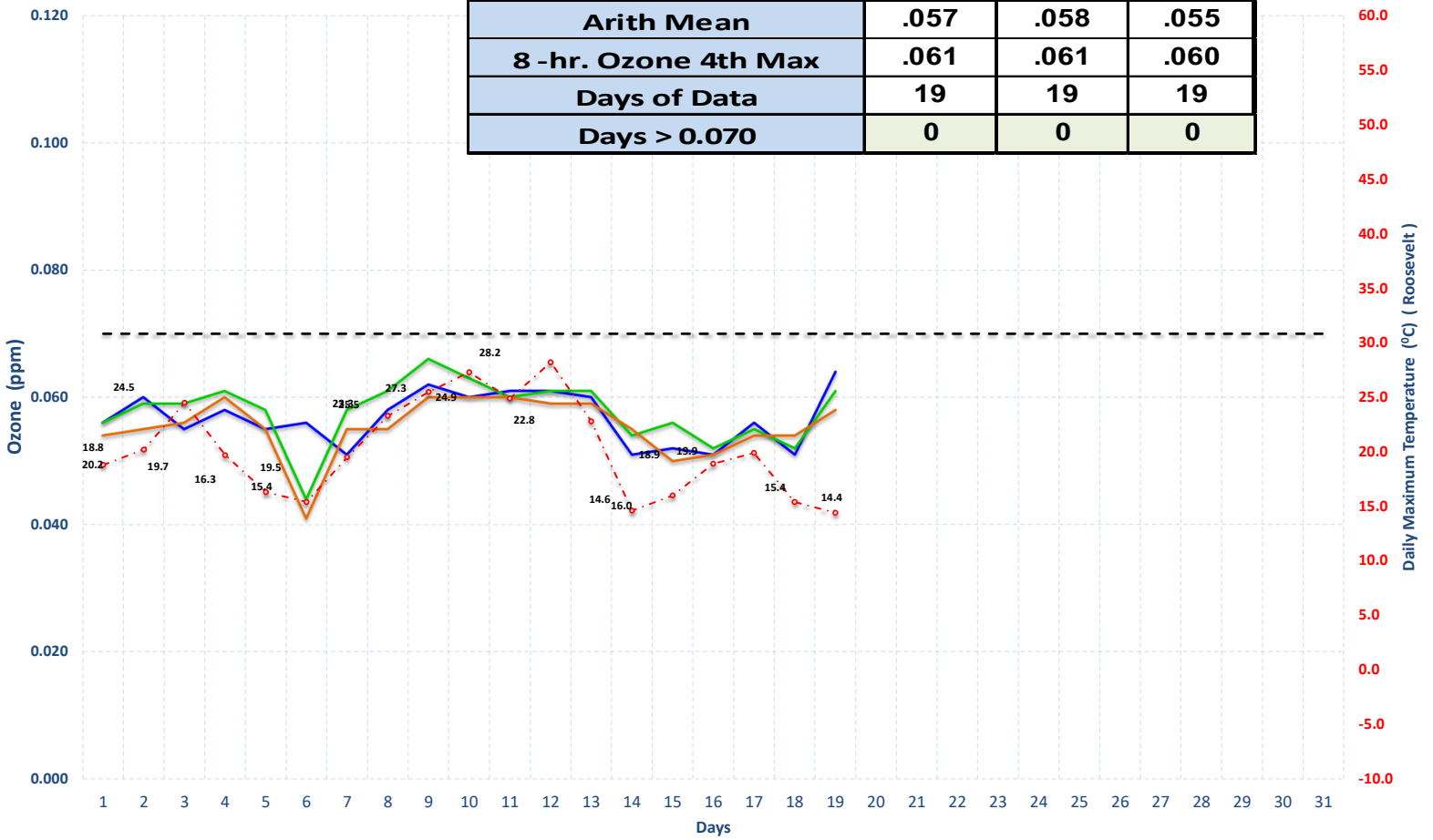
O3 May 2025	BV	CV	ED	H3	HV	HW	NR	RB	RP	EQ
Arith Mean	.055	.057	.053	.057	.054	.050	.050	.054	.054	.056
8 -hr. Ozone 4th Max	.065	.066	.062	.065	.063	.061	.060	.065	.062	.065
Days of Data	19	19	19	19	19	19	19	19	19	19
Days > 0.070	0	0	0	0	0	0	0	0	0	0



* Environmental Quality (**EQ**) previously named Technical Support Center (**TSC**)
** Controlling Monitor

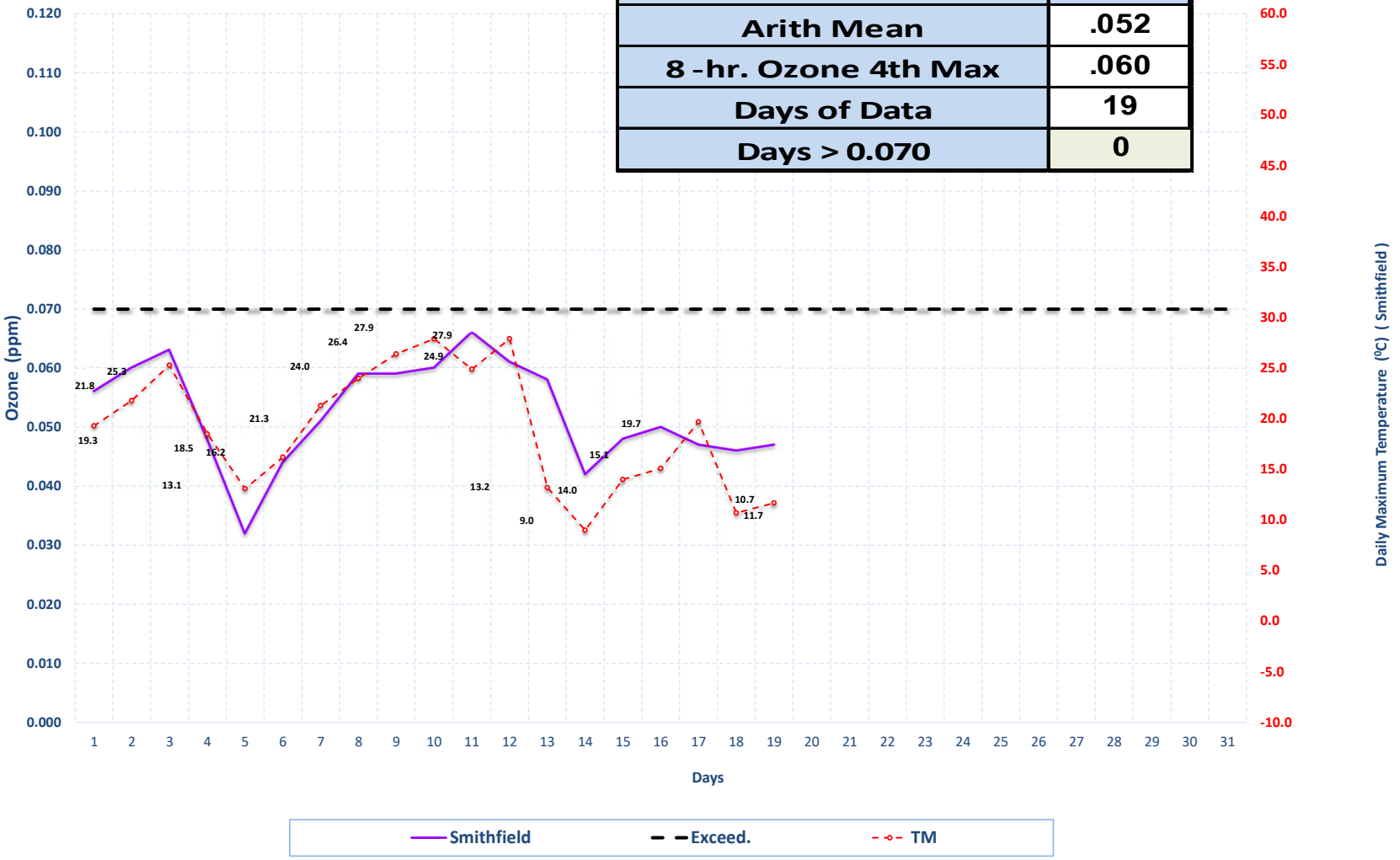
Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

	P2	RS	V4
Arith Mean	.057	.058	.055
8 -hr. Ozone 4th Max	.061	.061	.060
Days of Data	19	19	19
Days > 0.070	0	0	0



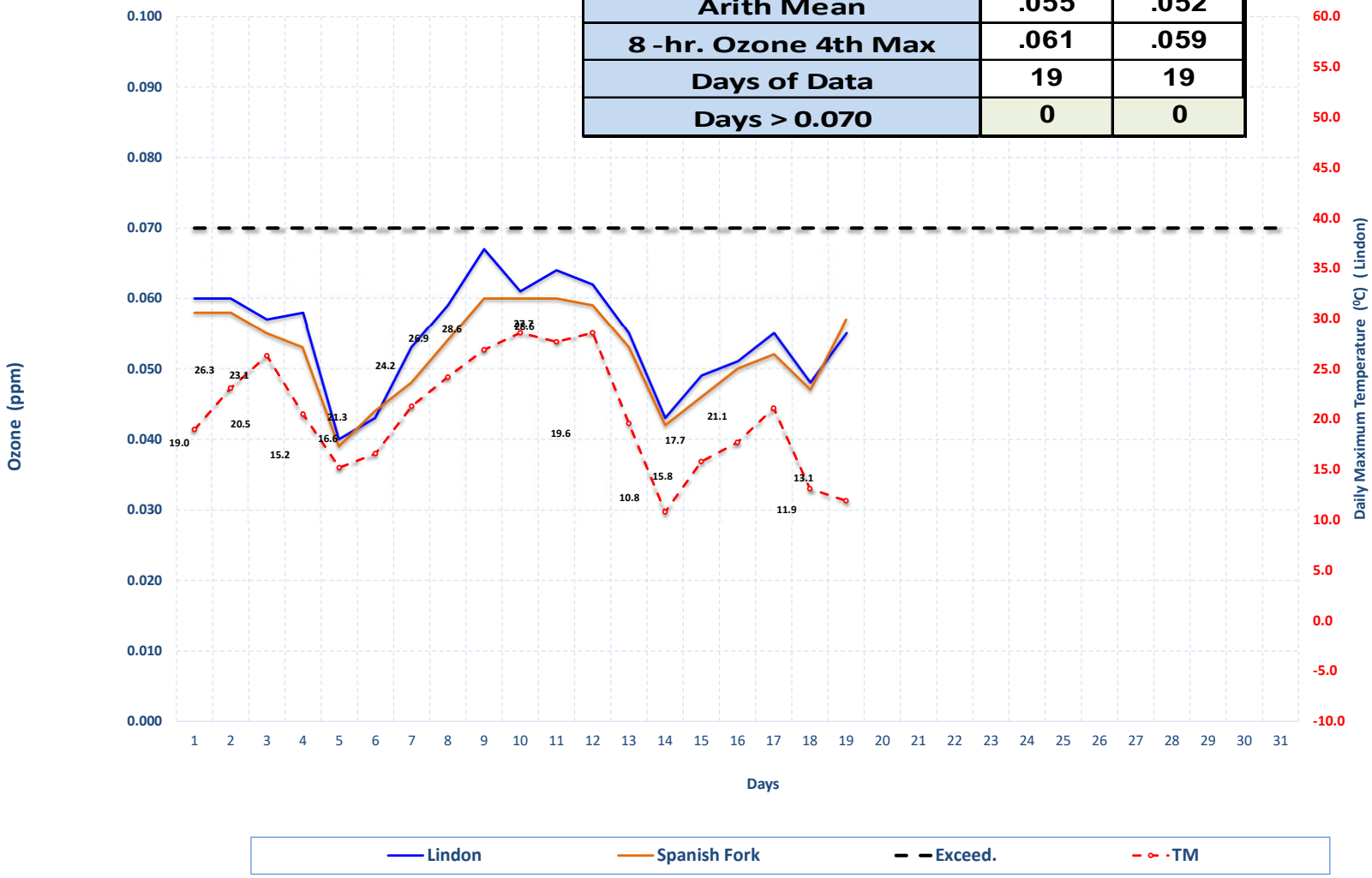
Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

	SM
Arith Mean	.052
8 -hr. Ozone 4th Max	.060
Days of Data	19
Days > 0.070	0



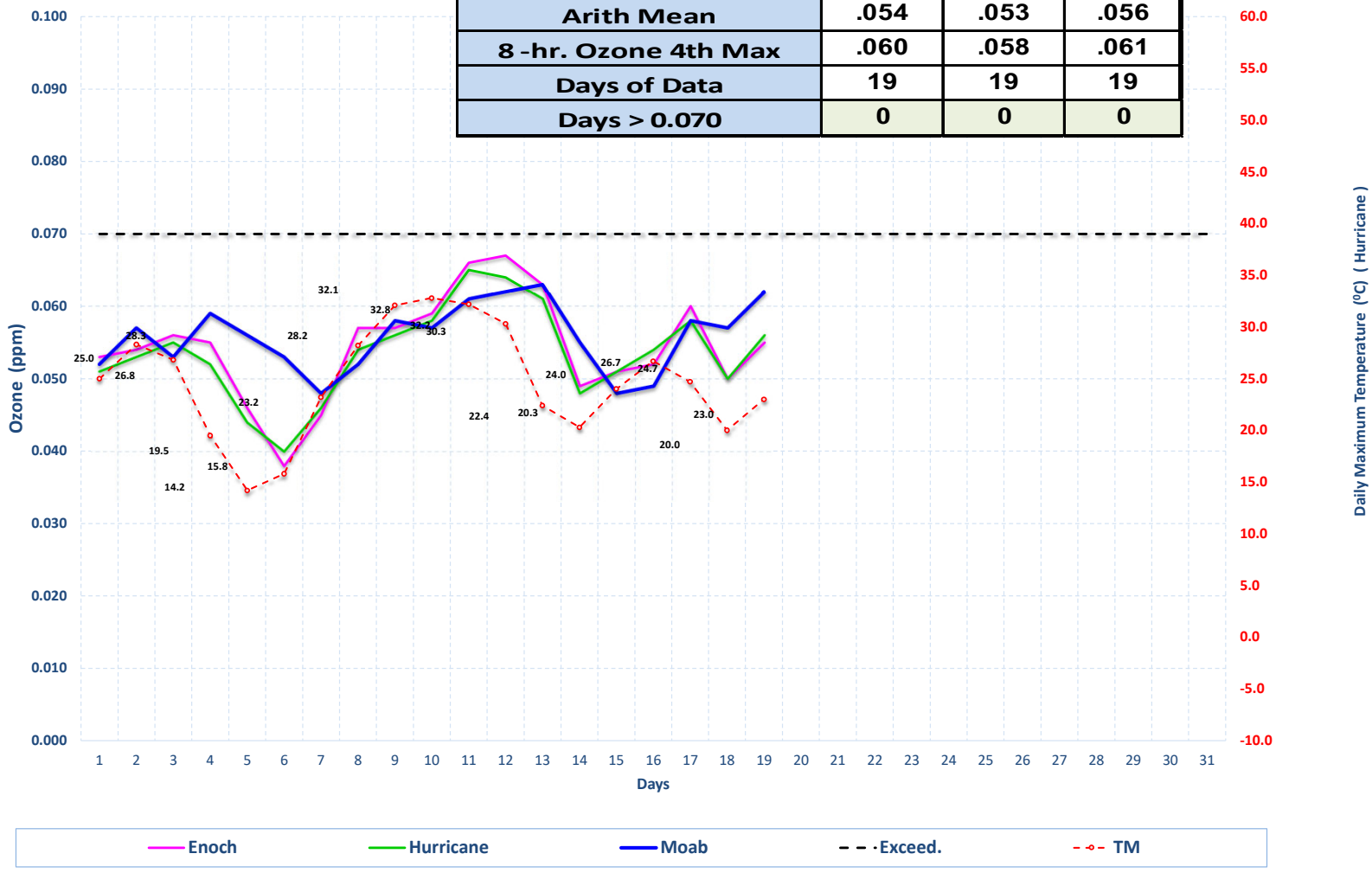
Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

	LN	SF
Arith Mean	.055	.052
8 -hr. Ozone 4th Max	.061	.059
Days of Data	19	19
Days > 0.070	0	0



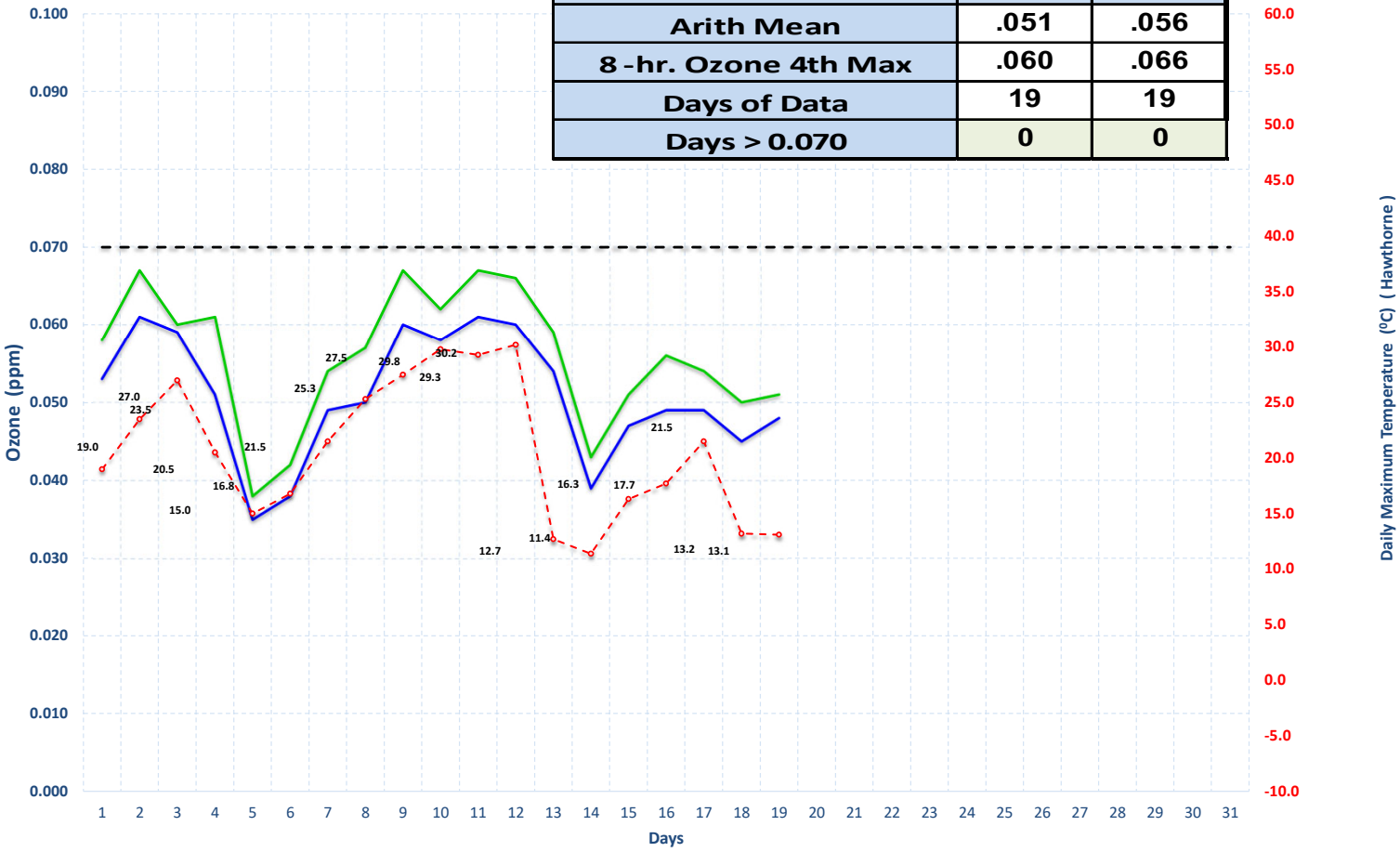
Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

	EN	HC	M7
Arith Mean	.054	.053	.056
8 -hr. Ozone 4th Max	.060	.058	.061
Days of Data	19	19	19
Days > 0.070	0	0	0



Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025
Stations Monitoring the Inland Port Development

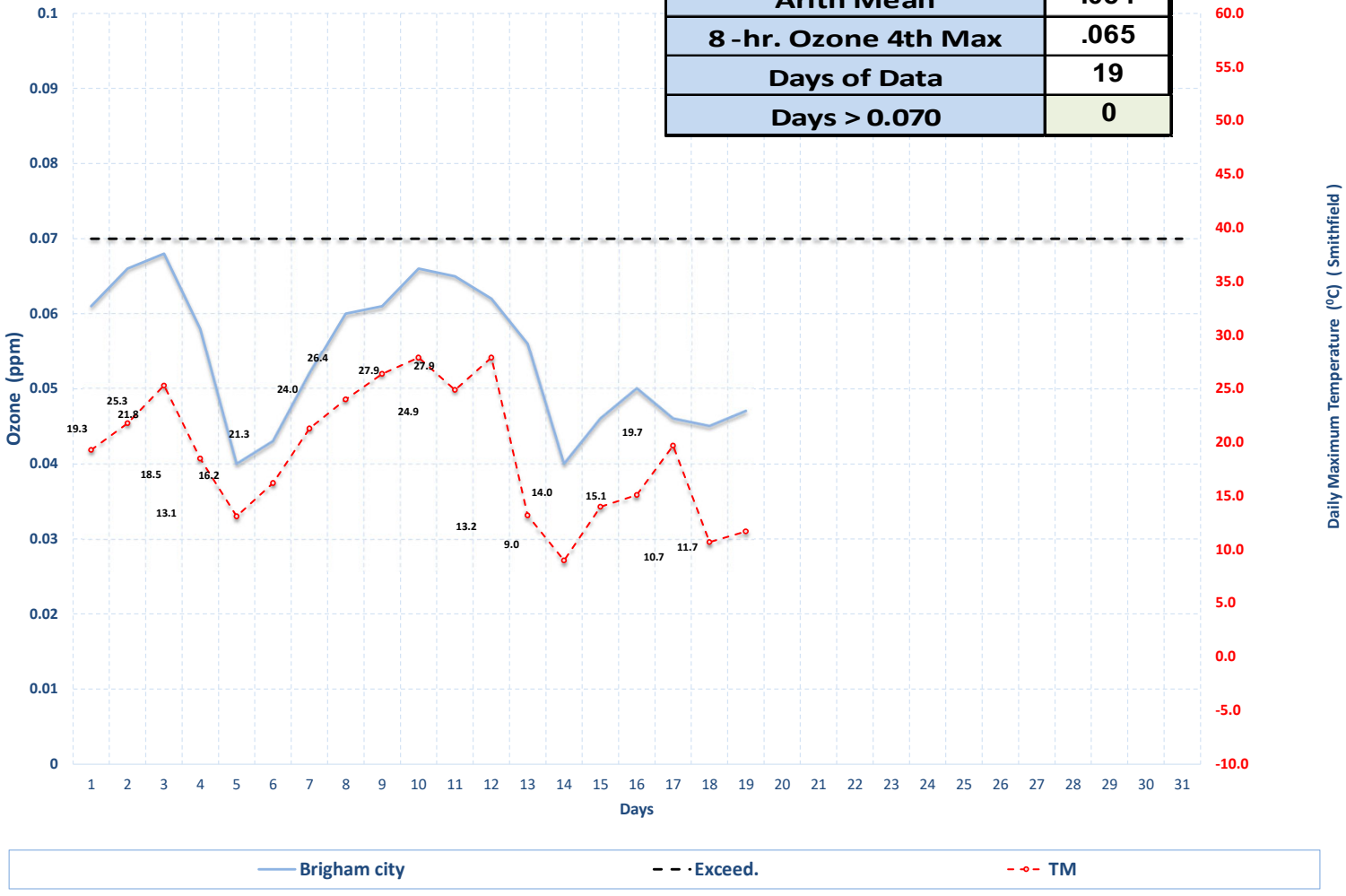
	ZZ	LP
Arith Mean	.051	.056
8 -hr. Ozone 4th Max	.060	.066
Days of Data	19	19
Days > 0.070	0	0



* **ZZ** is located at the New Utah State Prison (1480 North 8000 West, SLC).
This site was previously named **IP**

Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

	BG
Arith Mean	.054
8 -hr. Ozone 4th Max	.065
Days of Data	19
Days > 0.070	0



Highest 8-hr Ozone Concentration & Daily Maximum Temperature May 2025

	HB
Arith Mean	.057
8 -hr. Ozone 4th Max	.063
Days of Data	19
Days > 0.070	0