



State of Utah

Department of
Environmental Quality

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DIVISION OF AIR QUALITY
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DAQP-079-05

August 31, 2005

Lydia Wegman
US EPA RTP
Mail Code: C504-01
Research Triangle Park, NC 27711

Re: Utah Division of Air Quality Comments, *Staff Work Paper On the Use of Air Quality Data Related to Exceptional and Natural Events for the Particulate Matter Standards*

Dear Ms. Wegman:

The air quality in many western states has the potential to be severely impacted by natural events, particularly from blowing dust and fire emissions. Our staff worked with EPA OAQPS and WESTAR in the early 1990's on the development of the existing PM₁₀ Natural Events Policy (NEP). As we and other states have attempted to implement that policy, we have identified what we feel are major concerns with the policy or its implementation in the West.

Over the past two years, we have been heavily involved working with the WESTAR Council Planning Committee to review the current NEP, and have identified several important issues with the policy and its implementation. Additionally we formulated several recommendations that we provided to EPA for consideration during the NEP revision process.

We have also been working with the STAPPA/ALAPCO Criteria Pollutants Committee NEP workgroup on this same issue. Through that workgroup, we received a copy of EPA's draft "*Staff Work Paper*" identified above. We have reviewed that draft, and have several major concerns with it, most of which were identified and addressed in the WESTAR Planning Committee recommendations. In addition to those concerns, we noted that it appears that the staff paper has taken the "exceptional event" standard of "unusual and untypical for the area during the period under consideration," and applied it to "natural


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events," which have been generally acknowledged to be possible multiple times annually in any given area.

We believe that there are compelling reasons for your staff to work with the States to address the concerns identified by the WESTAR Planning Committee. We strongly urge you to consider the recommendations provided to EPA by WESTAR (copy attached). As always, we are very willing to work with EPA to address issues we have found in the NEP. We believe that it is imperative that the States be involved in the development of this new rule if EPA wants its implementation to be a success.

If you have any questions regarding these comments, please contact Dave McNeill of my staff at (801) 536-4037.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Sprott", is written over the typed name.

Richard W. Sprott
Director

RWS/DBM/gw