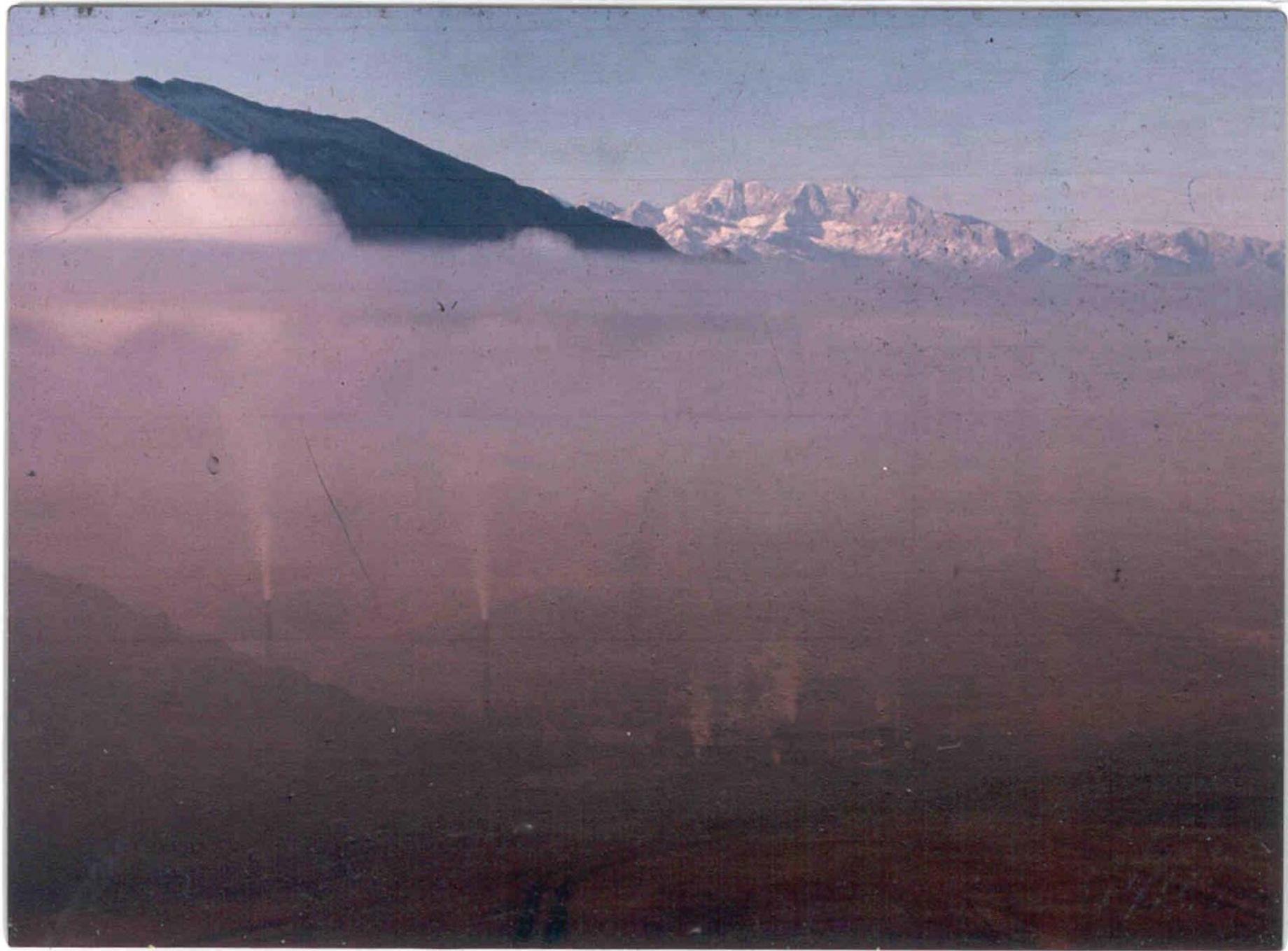


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Air Quality Issues

- Nonattainment areas at one time
 - Ozone
 - PM10
 - Carbon monoxide
 - Sulfur dioxide
- Maintenance areas now (attain health standards)
 - Ozone
 - Carbon monoxide
- Maintenance areas soon
 - PM10
 - Sulfur dioxide

PM10 and Ozone

- When the PM10 SIP was written in 1990-91, we looked for reductions in sulfur dioxide, not NO_x.
- Urban areas in Utah are VOC-limited.
- NO_x scavenges, reducing ozone.
- Outlying areas may behave somewhat differently.

Cost Benefit Analysis

- We really don't do it when writing SIPs.
- Why not?
 - The benefit is specified: meet the NAAQS.
 - We employ scientists and engineers, not economists.

Limits on Scientific Understanding

- Before looking at costs of various strategies, we need to be fairly certain of the exchange rate between pollutants in the atmosphere.
- Current models don't do that very well on the small scale in which we operate.
 - CMAQ used by WRAP for regional haze—36 km grid.
 - We need something much finer for our use.

Three Alternatives

- Data collection and analysis look complicated for #1 and #2.
- If we use one of them, does a source use the other to put us on the defensive? If so, we need to calculate all of them in order to remain on the offensive.
- Would we get different results from #1 vs #2?