



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8P-A

APR 29 2008

Cheryl Heying, Director
Division of Air Quality
Department of Environmental Quality
P.O. Box 144820
Salt Lake City, Utah 84114-4820

Re: 2007 Fireworks Impacted PM_{2.5} Data

Dear Ms. Heying:

This letter is in response to the Utah Department of Environmental Quality's December 24, 2007 submittal of demonstrations for a total of 5 PM_{2.5} data flags from July of 2007.

EPA Region 8 has reviewed the submitted demonstration packages for three of the flags: 1) the "other exceptional event" (fireworks) flag at the Rose Park monitor on July 4, 2007 (78.2 $\mu\text{g}/\text{m}^3$); 2) the "other exceptional event" (fireworks) flag at the West Valley City monitor on July 5, 2008 (50.5 and 49.1 $\mu\text{g}/\text{m}^3$ on the two monitors at that site); and 3) the "forest fire" flag at the Lindon monitor on July 9, 2007 (44.2 $\mu\text{g}/\text{m}^3$). EPA's Exceptional Events Rule on flagged data allows EPA concurrence on data that exceed the standard or contribute to an exceedance or violation of the standard if the state can demonstrate that the event caused the specific concentration at the specific monitoring location. Based on the documentation submitted for July 4, 5 and 9, 2007, EPA will be able to place an appropriate concurrence flag on the exceedance data from these three days.

Two of the flags receiving concurrence are for fireworks impacts on July 4 and 5, 2007. I would like to call your attention to the language of the Exceptional Events Rule preamble, and continue to encourage you to work within the local community to reduce the magnitude of these emissions, as well as to continue the work you are doing to provide information to the public on ways to limit exposure to high fireworks PM_{2.5} levels. The preamble states (Federal Register Vol. 72, March 22, 2007, page 13577):

"States are encouraged to take reasonable precautions to minimize exposures to emissions from fireworks displays, to explore the use of lower emitting fireworks, as well as to manage associated activities that may also have significant air quality impacts in the areas where these events are held. Such precautions may include alerting the public to the

potential for short-term air quality impacts that may result from the discharge of fireworks at large displays, monitoring prevailing winds, and locating displays downwind of concentrations of people.”

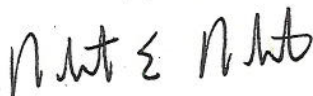
While the demonstrations for the July 4 and 5, 2007 exceedances indicate impacts from both large public fireworks displays and use of smaller fireworks material by individuals, working with organizations providing large scale displays to use lower emitting fireworks may serve to lower the overall PM_{2.5} levels in the area during holidays with fireworks displays.

EPA Region 8 has also reviewed the demonstration packages for two additional PM_{2.5} flags from July 11, 2007, at the Lindon and Spanish Fork monitors. EPA cannot concur at this time on these two additional flags. Specific issues with the demonstrations for that day were discussed at a staff level by Region 8 and Utah DEQ in October of 2007 as the demonstrations were being developed. Those issues were not completely addressed in the final demonstrations that went to the public on November 1, 2007 (in part due to the tight schedule constraints imposed on these 2007 flag demonstrations). Richard Payton of the Air Program will be in contact with your staff regarding the remaining issues for that day that will need resolution before Region 8 can provide concurrence on those data flags.

Finally, under the Exceptional Events rule, “Flags placed on data as being due to an exceptional event together with an initial description of the event shall be submitted to EPA...” in accordance with 40 CFR § 50.14. While Utah DEQ provided initial descriptions of these potential PM_{2.5} exceptional events to Region 8 via e-mail on October 1, 2007, EPA’s review of the data in AQS shows that initial descriptions of these events have not been loaded into AQS. The preamble to the Exceptional Events Rule states that the initial description is to be loaded to AQS at the time the flag is placed on the data. EPA plans to increase the functionality of the AQS software later this year to improve the existing capabilities for loading these comments. I would ask that initial descriptions be added to AQS for the flags which are addressed by this letter. For future events, the presence of the initial description in AQS will be a necessary condition for receiving regional concurrence.

As always, EPA staff are available to answer questions you may have and provide help where needed. If you have any questions, please contact Callie Videtich at (303) 312-6434.

Sincerely,



Robert E. Roberts
Regional Administrator

