



State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

Department of
Environmental Quality

Richard W. Sprott
Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

DAQP-019-08

September 4, 2008

Ms. Callie Videtich, Director
Air Program
US Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Dear Ms. Videtich,

On December 21, 2007, the EPA published changes to 40 CFR 51.166 and 40 CFR 52.21 to clarify the "reasonable possibility" recordkeeping and reporting standard of the 2002 NSR reform rules. As Executive Secretary of the Utah Air Quality Board, I have the authority to enforce state rules under Utah Code Annotated Section 19-2-107(g). In applying 40 CFR 52.21(r)(6) that is incorporated by reference in UAC R307-405-19, I commit to interpret the term "reasonable possibility" in a manner consistent with 40 CFR 52.21 that was published on December 21, 2007, unless state or federal rules are further modified.

Sincerely,

M. Cheryl Heying, Executive Secretary
Utah Air Quality Board