

## **MEDIA FACT SHEET: UTAH 179B(b) OZONE DEMONSTRATION & SOLUTIONS TO UTAH'S OZONE CRISIS**

**Background:** The state of Utah in May submitted a [demonstration](#) to the U.S. EPA falsely claiming that the Northern Wasatch Front (NWF) is not attaining federal ozone standards due to international emissions from Asia. The state relied almost exclusively on dubious modeling provided by the Utah Mining Association and the Utah Petroleum Association to make its claims, [despite the Division of Air Quality's \(DAQ\) own analysis rejecting them](#). Nonetheless, by virtue of the demonstration, Utah is seeking to avoid significant Clean Air Act requirements. If the demonstration is accepted the state would not be required to reduce the pollution that leads to ozone formation along the NWF and ozone concentrations could increase significantly, and still the state would be excused from having to take action to decrease emissions. Utahns would continue to be exposed to dangerous levels of ozone pollution, which would have devastating public health consequences.

### **If the demonstration is approved, Utah won't need to do much to reduce ozone pollution.**

- The NWF is currently a “marginal” nonattainment area. In its demonstration, Utah is asking EPA not to bump up the region to a “moderate” nonattainment area even though the NWF failed to attain the 2015 eight-hour ozone standard by Aug. 2021 deadline.
- If EPA approves the demonstration, the NWF will stay a marginal nonattainment area and Utah would be required to do very little, if anything, to reduce emissions that contribute to ozone pollution. NWF residents would not be entitled to more rigorous public health protections afforded by the Clean Air Act.
- For example, Utah would not have to identify and implement emission control strategies, make steady progress toward attaining the standard by August 2024, achieve a 15% reduction in volatile organic compounds (which contribute to ozone), or comply with other Clean Air Act measures meant to bring the region into attainment as expeditiously as possible.
- This refutes DAQ Director Bryce Bird's [incorrect statement](#) that a successful “179B [demonstration] does not take you out of nonattainment. We are still in nonattainment, and we still have to identify control strategies. We still have to meet the standard. We're not off the hook for that[.]” **The opposite is true, as the requirements applicable to a marginal nonattainment area are minimal.**

### **The state is using misleading data on ozone pollution from vehicles and international sources to support its claims and the demonstration.**

- State officials [have claimed](#) that more than 80% of summer emissions along the NWF are transported from other states or nations or are naturally occurring, and just 20% of emissions are from human activity originating within Utah. This is misleading and not relevant to Clean Air Act protections. The [EPA concluded](#) that every area across the country can comply with the federal ozone standard regardless of natural emissions and human-made emissions generated outside the U.S, and that international ozone concentrations will not prevent attainment of the 2015 ozone standard.
- **Data shows that international emissions are not the cause of ozone concentrations along the NWF that exceed the federal standard.** An EPA analysis concluded that when ozone concentrations are at their highest and exceed the 2015 ozone standard, so are contributions

from local and U.S. sources. **For this exact reason, Utah’s demonstration fails to show that Utah would meet the ozone standard “but for” international emissions.**

- It is misleading to state that 63% of human-caused ozone in Utah comes from mobile sources such as vehicles. Data Utah [submitted](#) to and [finalized](#) by the EPA show that along the NWF, only 41% of local emissions that form ozone (human-made nitrous oxides and human-made volatile organic compounds) come from the cars and trucks driven on Utah’s roads. The remaining 59% of so-called ozone precursor emissions are from large industrial sources, such as the Salt Lake area oil refineries and Kennecott, non-road mobile sources, such as industrial and construction equipment, locomotives, and airport ground support, and nonpoint or area sources, such as dry cleaners, residential cooling, auto body painting, and consumer solvents.

#### **Utah has practical solutions available to reduce emissions and local ozone pollution.**

- Ozone pollution will continue to get worse in Utah due to climate change and rising temperatures. Thus, it’s essential that Utah start making substantial reductions in local air pollution right now. There are many solutions the state can pursue.
- Utah should follow its neighbors, including NM, NV, and CO, to accelerate the transition to zero-emission vehicles. A [Utah Foundation report](#) found that zero- and low-emission vehicles (ZEV and LEV) offer a path to decreasing the emissions that cause climate change and pollute Utah’s air, even with more drivers on the road and regardless of whether the electricity used for charging comes from renewables. Transitioning to cleaner sources of electricity would create even greater emissions-reduction benefits.
- Utah should adopt a ZEV standard, which will bring more choices of electric vehicles to Utah consumers. This will allow the state to take better advantage of the targets many auto manufacturers have set to sell only ZEVs in the coming years, and increase the makes and models they offer.
- WRA and its partners have presented to DAQ and EPA [an expert analysis](#) of readily available controls that could be used to reduce ozone precursor emissions from Utah’s refineries and mining operations. Utah should look to measures taken in other states to do more to limit pollution coming from sources like industrial and construction equipment and trains to reduce ozone pollution.

#### **When Utah reduces emissions, it reduces ozone pollution.**

- While the 179B(b) demonstration claims that the Southern Wasatch Front, which includes Utah Valley, is also impacted by international emissions, the area *is* meeting the federal ozone standard. The [ozone-specific inventory DAQ submitted to the EPA](#) shows that local, controllable emissions of the pollutants that form ozone (nitrous oxides and volatile organic compounds) are considerably lower in the SWF. This directly refutes Gov. Cox and his administration’s argument that, because there have already been reductions in ozone precursor emissions in the Salt Lake Valley and ozone concentrations have not reduced much, there is little Utah can do to meet the ozone standard in the NWF ([see pg. 4 of 179B\(b\) demonstration](#)). **The SWF shows that when Utah reduces local nitrous oxides and volatile organic compounds, it reduces local ozone pollution.**

#### **Utah’s ozone problem is a public health crisis.**

- The Salt Lake City-Provo-Orem area ranks 8<sup>th</sup> on the [American Lung Association’s](#) list of most polluted cities for ozone.
- Ozone pollution attacks the lungs and throat, and even short-term exposure can lead to shortness of breath, wheezing, and coughing, asthma attacks, and damage to Utahns’ lungs that

makes them more susceptible to infection. Long-term exposure increases risk of premature death in older adults, leads to more hospital admissions for children with asthma, and leads to low birth weight, stillbirth, and decreased lung function in newborns.

- Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high. Children are also more likely than adults to have asthma.
- [The World Health Organization recently recommended](#) lowering the standard for ozone pollution from 70 parts per billion to 50 parts per billion. However, no level of ozone pollution is considered safe from a public health standpoint.

#### **Utah's low-income and BIPOC communities face a disproportionate burden of ozone pollution.**

- [Research shows](#) that low-income communities in the Salt Lake City area face disproportionate levels of pollution, and experience more adverse health outcomes because of it. Furthermore, [heat](#) combined with air pollution is detrimental to human health, and disproportionately impacted communities bear a [higher burden with both](#).
- As temperatures continue to rise due to climate change, it is imperative that Utah's leaders address ozone pollution to protect the state's low-income communities and communities of color from facing further adverse health impacts.

#### **Unabated ozone pollution harms Utah's economy.**

- A 2016 EPA study found that reducing ozone levels would save billions of dollars per year in lost productivity. Businesses along the Wasatch Front have struggled to recruit employees when pollution events are bad.
- [A recent BYU study](#) states that "Air pollution costs Utah's economy \$1.8 (\$0.58–3.2) billion annually (Fig. 1C)." This economic damage is split between direct costs, such as healthcare expenses and lost earning potential, as well as indirect costs, such as loss of tourism, decreased growth, regulatory burden, and business costs. These estimates are more conservative than those from national economic studies, which suggest that air pollution in the state costs \$7.4 (\$6.2–8.6) billion annually when downscaled to Utah by population and GDP.