

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### DIVISION OF AIR QUALITY

#### FY 2006 GOALS

#### I. DAQ STRATEGIC GOAL

##### PROTECT THE ENVIRONMENT

Attain and maintain air quality to protect public health and the environment through a comprehensive program including development and implementation of air pollution control strategies; promotion of compliance; monitoring of emissions and ambient air; promotion of appropriate pollution prevention activities; and further development and optimization of the emissions inventory process. Develop and implement control strategy plans, permitting process and compliance procedures, and rules which protect air quality, enhance appropriate development, and enhance Utah's economic potential. Operate a quality assurance program under a comprehensive Division QA policy.

##### Measures:

- a. National Ambient Air Quality Standards are attained and maintained.<sup>CPM A1 P2</sup>
- b. National Emission Standards for Hazardous Air Pollutants are attained and maintained.  
<sup>CPM A2</sup>
- c. PSD Increments are protected.
- d. State Implementation Plans (SIPs) are developed to attain and maintain air quality.
- e. Regulated community compliance status improves.
- f. Monitoring network collects appropriate and valid data.<sup>CPM A7</sup>
- g. Appropriate emission inventories are completed and trends analyzed.<sup>CPM A1</sup>
- h. Appropriate permits are issued in accordance with the Clean Air Act and State law requirements.

##### DIVISION ANNUAL GOALS

1. Develop and implement appropriate SIPs for all areas of the state.<sup>CPM A4 A6</sup>

**Measures:**

- a. State develops all State Implementation Plan revisions required to meet federal law and submits them to EPA for their review and approval according to the established timeframe.
  - b. All measures contained in the SIP approved by the Air Quality Board are fully implemented.<sup>CPM A7</sup>
2. Address air quality issues in areas of the state outside the Wasatch Front, as appropriate.

**Measures:**

- a. Cache County stakeholders are assisted to assess the air quality in the Cache Valley.
  - b. Washington County stakeholders are assisted to assess the air quality in the St. George area.
3. Develop and improve appropriate inventories.<sup>CPM A1 A5</sup>

**Measures:**

- a. The Title V inventory is prepared by August 15.
  - b. Required inventory data is entered into the NEI by June 1.
  - c. Non-HAP/non-Criteria/non-MACT regulated pollutants are inventoried as required by federal rules.
  - d. The inventories required for the Maintenance Plans and SIPs are developed as required and appropriate technical support for each is submitted to EPA for their review with the applicable plan.
4. Continue to meet federal requirements for PSD increment tracking.

**Measures:**

- a. Increment consumption for Major Sources is tracked as permits are issued.
5. Maintain an adequate ambient air quality monitoring program meeting the requirements of 40 CFR Part 58 to assess public exposure to air pollutants and to establish the attainment status.<sup>CPM A3 A4</sup>

**Measures:**

- a. The annual Monitoring Network Review is completed and submitted to EPA by June 30.
  - b. The PM<sub>2.5</sub> monitoring network is maintained and operated.
  - c. Monitoring data are submitted to EPA 90 days after each quarter.
  - d. Locations for new monitoring sites are based on current emission inventories, air quality modeling and EPA regulation.
  - e. Staff works with EPA to assess the impacts of proposed changes to 40 CFR 58, and begin planning for the implementation of those changes (National Monitoring Strategy/Ncore Monitoring Network).
  - f. The National Air Toxics Trends site in Bountiful is operated in accordance with NATTS QAPP with appropriate updates.
6. Review and implement appropriate pro-active pollution reduction measures.<sup>CPM A2</sup>

**Measures:**

- a. Pollution prevention measures are promoted during permit development where appropriate and feasible.
7. Maintain the compliance status of air pollution sources in the State.

**Measures:**

- a. By November 15, prepare and submit to EPA for review and approval the compliance monitoring strategy incorporating the provisions of EPA's April 25, 2001 Clean Air Act Stationary Source Compliance Monitoring Strategy.
  - b. Asbestos notification, certification and outreach programs are continued, and at least 120 on-site inspections are performed.<sup>ASB</sup>
  - c. The work program for the AHERA Toxic Substances Compliance Monitoring Grant is continued. The AHERA Grant Work Plan approved by EPA Region VIII will be the environmental measure of success for the Utah AHERA Program.<sup>CPM A7</sup>
8. Protect public health and the environment through implementation of the Utah Lead-Based Paint Certification, Accreditation and Work Practices Program.

**Measures:**

- a. The Utah Lead-Based Paint Grant Work Plan approved by EPA Region VIII will be the environmental measure of success for the Utah Lead-Based Paint Certification, Accreditation and Work Practices Program.<sup>LD</sup>
9. Implement the Operating Permits Program meeting the current requirements of Title V, CAAA 1990, and the Utah Air Conservation Act.

**Measures:**

- a. An Operating Permits Program is continued as described in program approval from EPA.
- b. The provisions of the Acid Rain Act and 40 CFR Part 72 and Part 76 are implemented.
10. Continue issuing approval orders for new sources and modifications of the existing approval orders.

**Measures:**

- a. Communications with sources are carried out effectively to complete NOI submittals and any other information necessary for reviews.
- b. Air quality modeling is completed to ensure the protection of the NAAQS and PSD increment ceilings in Class I and Class II areas.
- c. Hazardous air pollutants (HAP) and other non-criteria regulated pollutant emissions are documented and reviewed, and if necessary, air quality modeling for HAP sources is completed to assess the ambient impact.
- d. Any issues identified in EPA program evaluations in FY06 for NSR and Title V are addressed.
- e. BACT/LAER determinations are either entered into the RACT/BACT/LAER Clearinghouse or the information is provided to EPA so they can enter the data.
11. Continue issuing pollution control facility certifications for sales tax exemption.

**Measure:**

- a. Pollution control facility certifications are issued within 120 days from the application date.
12. Quality Assurance programs are reviewed for effectiveness.

**Measures:**

- a. Statistical quality standards are met for the collection of ambient air data and emissions inventories prepared by the State.
- b. Rules, regulations, procedures, policies, and protocols are complied with.
- c. Regulatory activities are documented, including the appropriate technical support.
- d. The State and EPA agree on the adequacy of air program results.

**II. DAQ STRATEGIC GOAL**

**INVOLVE OTHERS IN THE PROCESS**

Involve customers (internal/external) in the development of SIPs, issuing permits, and compliance activities. Form partnerships with stakeholders to ensure consideration of all relevant issues. Align with customer (internal/external) needs and improve delivery of quality service by identifying and understanding customer needs, and by negotiating reasonable solutions to meet customer needs.

**Measures:**

- a. Customer feedback is obtained, reviewed, and appropriate action is taken.
- b. Cost of implementation is evaluated.
- c. Time required to meet customer needs is minimized.
- d. Stakeholders are involved in the development of air quality strategies and plans.

**DIVISION ANNUAL GOALS**

- 1. Enhance the DAQ web site to increase the availability for public usage.

**Measures:**

- a. Progress is made to develop provisions for external customers to comment on proposed rules, submit inventory data, and submit NOIs and emissions inventories via the web, as well as providing clear and accurate information via the web.
  - b. Staff input to the web page increases, including increased availability of public documents, data, charts, graphs, project status, etc.
- 2. Involve affected entities in the rule making, SIP development, and permitting processes.

**Measures:**

- a. Partnerships include appropriate parties and the scope of the affected entities and their respective roles are clearly defined.
  - b. Meetings are held to address a variety of issues including environmental, health, and economic concerns, statutory requirements and implementation.
  - c. SIP stakeholder workgroups are supported during development of revisions to the SIP.
3. Maintain the small business assistance program (SBAP) to actively assist small businesses to comply with rules of the Board.<sup>SBA</sup>

**Measures:**

- a. Educational Assistance is offered to all small businesses affected by adopted NSPS and MACT standards.
  - b. As appropriate, the Small Business Advisory Panel's role is modified to increase the effectiveness of the SBAP.
  - c. On-site assistance is provided when requested.
  - d. The small business work plan for the Small Business Advisory Panel is modified as appropriate to better meet assistance needs.
  - e. Assistance tracking is modified as appropriate to better provide and measure assistance needs.
4. Improve DAQ internal communications.

**Measures:**

- a. Quality Council will be used to identify cross-cutting issues and establish appropriate workgroups to discuss those issues.
5. Provide technical support and application development of Geographic Information Systems (GIS) technology.

**Measures:**

- a. Appropriate use is made of GIS applications for spatial allocation of emissions data, meteorological data and model outputs for stakeholders.
- b. Additional GIS applications in air quality management are explored as appropriate.

### **III. DAQ STRATEGIC GOAL**

#### **PARTNER WITH OTHER GOVERNMENT AGENCIES**

Work in partnership with local government, MPOs, and other state and federal agencies to develop and implement programs for the protection of air quality statewide and to achieve and maintain acceptable air quality along the Wasatch Front.

##### **Measures:**

- a. Conformity determinations of TIPs and LRPs are reviewed and comments submitted to the appropriate agency within the comment period of each finding.
- b. Partnership satisfaction and feedback are measured.
- c. Appropriate areas of responsibility are defined for DAQ and local agencies.
- d. Recognition, discussion, prioritization, and resolution of applicable air quality issues occurs.
- e. The State and EPA work together to meet air quality goals in Utah.

#### **DIVISION ANNUAL GOALS**

- 1. Continue to implement R307-204, Smoke Management, the Utah Smoke Management Plan (SMP), and MOU to mitigate smoke impacts from managed natural fires and prescribed fire on visibility, public nuisance, and the health-based NAAQS.

##### **Measures:**

- a. Necessary burn approval and denial decisions made by the Smoke Program Coordinator and Executive Secretary are coordinated with partner agencies.
- 2. Participate as appropriate in activities of other partner agencies.

##### **Measures:**

- a. The State and EPA work together to understand the causes of elevated levels of PM2.5 in

the Cache Valley, and work with stakeholders from Cache County, USU, Franklin County, and Idaho State to conduct appropriate studies and collect and analyze appropriate data.

- b. DAQ staff are involved in planning activities of the MPOs, UDOT and UTA.
  - c. DAQ staff works with the MPOs to acquire and analyze vehicle miles traveled (VMT) data for use in inventory work of the Division.
  - d. Local health department staff are trained as requested in the siting and operations of monitoring equipment.
  - e. DAQ staff attend/participate in EPA regional meetings and conference calls which will focus on sharing information and building State capacity to identify, characterize and address air toxics risks in Utah communities.
  - f. Training and other assistance will be provided to tribal air quality staff as requested and within available DAQ resources.
3. Provide technical support to LHD vehicle emissions Inspection and Maintenance (I/M) programs.

**Measures:**

- a. The LHDs are included in efforts to quantify effectiveness of existing and proposed I/M programs in support of future SIP development.
  - b. Technical assistance is provided to LHD I/M program staff.
4. Support and contribute to the goals and objectives of the Center for Automotive Science and Technology at Weber State University.

**Measures:**

- a. Accurate information is provided to stakeholders about the impact of emissions, emission control systems and efficiency of vehicles.
  - b. Mobile source emission education & training is provided to local & national automotive technicians, instructors, regulatory officials, field engineers and consumer groups.
  - c. DEQ staff partner with secondary and post-secondary engineering and automotive technology programs and assist them in strengthening their air quality-focused programs.
5. Work with EPA to obtain federal actions on the backlog of State submittals.

**Measure:**

- a. Appropriate assistance is provided to EPA staff responsible for completing federal action on each submittal to facilitate final EPA action on each.

**IV. DAQ STRATEGIC GOAL**

**MAINTAIN DELEGATION OF FEDERAL PROGRAMS**

Delegation of federal air quality programs identified in the Clean Air Act Amendments of 1990 by developing appropriate plans, programs, policies, procedures and rules and by actively influencing non-delegated federal air quality programs to reflect Utah needs.

**Measures:**

- a. Delegated programs are maintained and meet Utah needs.
- b. Program activities result in minimal federal intervention.
- c. Federal and state air quality regulations and rules are reviewed regularly and changes are made to ensure continued authority, applicability and enforceability.

**DIVISION ANNUAL GOALS**

1. Implement designated facility plans, NSPS, NESHAPS, MACTs, CTGs and RACT.

**Measure:**

- a. MACT Standards that apply to sources in Utah are adopted and implemented through the Operating Permit process as they are developed and promulgated by EPA.
  - b. NSPS standards that apply to sources in Utah are adopted and implemented through the permit process as they are developed and promulgated by EPA.
  - c. Rules implementing specific source RACT are developed and implemented as appropriate.
  - d. RACT determinations included in the Ozone Maintenance Plan and PM10 SIP and Maintenance Plan are reviewed and updated as appropriate.
2. Continue to submit data to EPA as required by EPA.<sup>CPM A7</sup>

**Measures:**

- a. Quality assured ambient air pollution data is submitted to AIRS no later than 90 days after each calendar quarter.
- b. Data precision and accuracy assessments is submitted to AIRS no later than 90 days after each calendar quarter.
- c. The database is monitored on an ongoing basis for accuracy and completeness.
- d. Data summary reports are printed for regulatory and public use as appropriate.

**V. DAQ STRATEGIC GOAL**

**INFLUENCE STATE, REGIONAL, AND NATIONAL POLICY**

Influence Utah, regional and national air quality policy by actively participating with the Utah Legislature and active involvement with established regional and national policy making organizations.

**Measures:**

- a. Participation in Utah, regional and national policy-making organizations.
- b. Utah, regional/national policies reflect State and program needs/ requirements.

**DIVISION ANNUAL GOALS**

- 1. Actively participate in appropriate Utah, regional, and national policy-making organizations.

**Measures:**

- a. The DAQ provides input into the work products of the WRAP, WESTAR, STAPPA, WGA, and FACA Mobile Source Committee.
- b. Where offered and appropriate, DAQ employees assume leadership roles in the activities of forums, teams, or committees of WRAP, WESTAR, STAPPA and AWMA.
- c. DAQ information is provided to the Administrative Rules review committee and other legislative bodies as requested.
- d. DAQ actively participates in appropriate meetings of the MPOs.

**VI. DAQ STRATEGIC GOAL**

## **INCREASE PUBLIC AWARENESS**

Educate the general public and small businesses about the sources of air pollution, methods to reduce emissions, and the personal and economic benefits of voluntary reductions of air pollution.

### **Measures:**

- a. Public awareness of the causes of air pollution is increased.
- b. Voluntary measures are quantified and used as control strategies where appropriate.
- c. School curricula are developed and staff trained appropriately.

## **DIVISION ANNUAL GOALS**

1. Provide information to the public that may result in lower emissions from the transportation sector of the inventory.

### **Measures:**

- a. Information is prepared and disseminated that promotes the use of alternate fuels.
  - b. The Choose-Clean-Air campaign is continued.
  - c. No-drive-days and no-burn-days are continued.
  - d. Information regarding alternate commute options is provided to appropriate agencies.
2. Respond to questions from the public regarding air quality issues.

### **Measure:**

- a. Questions from the public regarding air quality issues are answered in a timely manner.
  - b. Ambient air quality data is provided to the AirNow and EnviroFlash Programs.
3. Conduct community outreach and analysis concerning air toxics issues as determined appropriate by the division and considering available resources and report results to EPA.

### **Measure:**

- a. Work to conduct community outreach and analysis concerning air toxics issues is

completed based on need and resources.

- b. Accomplishments are reported to EPA in the annual year-end report.

## **EPA's Portion of the PPA**

### **Division of Air Quality**

1. EPA Region VIII will work with UDAQ as necessary and appropriate when reviewing SIP submittals to clarify issues and communicate actions that may affect Utah.
2. EPA Region VIII will participate in UDAQ Board Meetings when specific issues regarding the partnership between EPA Region VIII and UDAQ are part of the agenda and travel funds permit.

### **Planning Branch**

1. EPA Region VIII will work with EPA HQ when appropriate to help elevate issues to the national level that are uniquely western issues.
2. EPA Region VIII will work with other affected EPA offices when appropriate to consider various approaches to addressing specific issues that impact Utah.
3. EPA Region VIII gives timely attention to any intermediate work products that are developed in the SIP process so as to provide UDAQ its feedback during project development rather than at the end.
4. EPA makes every effort to determine completeness and to take final action on regulatory actions submitted by Utah in accordance with statutory time frames considering existing resources.
5. EPA Region VIII and UDAQ will work together to prioritize existing SIP submittals and on identifying upcoming SIP revisions. EPA Region VIII will keep UDAQ informed on the status of actions.

### **Permitting Branch**

1. EPA will provide review and comments as appropriate for the ITAs within the 30-day public comment period.

### **MACT Compliance and Enforcement Activities**

1. EPA Region VIII, Office of Enforcement, Compliance and Environmental Justice and Utah

Division of Air Quality will work to keep each other informed of important and potentially controversial activities involving regulated sources in Utah, including activities involving national and regional initiatives. EPA continues to implement PSD/NSR, Coal Fired Power Plant, MACT and Refinery initiatives nationally and is working to develop an Oil and Gas initiative regionally.

2. EPA and the State will jointly determine which MACT source categories in Utah pose the greatest impact to the public. Particular focus will be placed on those MACT source categories determined to have substantive non-compliance and those facilities whose compliance status has not been determined. EPA and the State may conduct joint, in-depth inspections for those source categories identified above.

### **Monitoring**

1. EPA Region VIII will support UDAQ and USDA in efforts to ascertain the impact of fire emissions on the UV method FRM ozone monitors.

Schedule for the Utah Regional Haze SIP (8/31/05)  
Section 309 Re-submittal and New 308 SIP

	<b>Anticipated Completion Date</b>
Work with WRAP to complete template for 308 SIP	Late 2005
Work with WRAP to submit comments on proposed Alternatives to BART and new 309	September 17, 2005
Work with WRAP states to determine appropriate analysis for 309 re-submittal; conduct analysis	<b>Twelve months</b> after EPA revises 40 CFR 51.308(e)(2) and 51.309
Work with WRAP to complete template for new sections of 309 SIPs	<b>Six months</b> after EPA revises 40 CFR 51.308(e)(2) and 51.309
Complete analysis of Attribution of Haze, Phase II as applied to Class Is affected by Utah emissions	October 2006
Negotiations with adjacent states to determine appropriate control measures to address each state's impact on Class Is in the other state	December 2006 - February 28, 2007
Complete draft SIPs and rules for stakeholder review	March 31, 2007
Conduct stakeholder meetings to discuss draft	April 1 - August 15, 2007
Air Quality Board proposes drafts for comment	September 5, 2007
Public Comment Period	October 1 - 31, 2007
Air Quality Board approval	December 5, 2007
Submit SIPs and associated rules to EPA	December 17, 2007

Schedule for Utah's 110(a)(2)(D) SIP (8/31/05)

<b>Milestone</b>	<b>Anticipated Completion Date</b>
Draft SIP ready for stakeholder review	<b>One month</b> after EPA issues guidance
AQB propose SIP for public comment	<b>Two months</b> after EPA issues guidance
AQB adoption of SIP	<b>Six months</b> after EPA issues guidance
Submit SIP to EPA	<b>Seven months</b> after EPA issues guidance

## Schedule for Adopting PSD Reform Provisions: 8/31/05

<b>Milestone</b>	<b>Completion Date</b>
Draft rules for stakeholder review	A draft of R307-405 was completed in May, 2005. However, this draft does not address the <i>State of New York vs. EPA</i> decision.
Final Stakeholder meeting to discuss draft rules	<b>One month</b> after EPA revises 40 CFR 52.21 to address the <i>State of New York vs. EPA</i> decision. We are assuming that EPA will revise 40 CFR 52.21 to remove the portions that have been vacated. We intend to wait for that action to occur so that we can incorporate the revised regulation by reference.)
Air Quality Board Approval for Comment	<b>Two months</b> after EPA revises 40 CFR 52.21.
Air Quality Board Final Adoption	<b>Six months</b> after EPA revises 40 CFR 52.21.
UDAQ submits revised rules to EPA	<b>Seven months</b> after EPA revises 40 CFR 52.21
SIP Revision due to incorporate NSR Reform Provisions	January 2, 2006

Note: Utah was on-track to complete rulemaking and submit a revised PSD rule to EPA by the January 2, 2006 deadline. The schedule has now been delayed because we are waiting for guidance from EPA about how to address the *State of New York vs. EPA* decision. UDAQ does not believe that we will be able to meet the January 2, 2005 deadline unless EPA provides clear direction and revises 40 CFR 52.21 by the end of August, 2005. However, we plan to move as expeditiously as possible once we receive guidance from EPA.

## Schedule for Adopting NAA NSR Reform Provisions: 8/5/05

Note: UDAQ is unable to move forward with revising R307-403 (*Permits: New and Modified Sources in Nonattainment Areas and Maintenance Areas*) until EPA finalizes changes to Appendix S and issues implementation guidance for the 8-hour ozone and PM<sub>2.5</sub> standards.

<b>Milestone</b>	<b>Completion Date</b>
Draft NAA NSR rule revision for internal DAQ review (note: 40 CFR 51.165 has major gaps that are addressed by Appendix S – this portion of the rule has not yet been finalized by EPA)	Draft complete in June, 2004
EPA Finalize Revisions to Appendix S and 40 CFR 52.24	Unknown – Summer 2005? Tied to Phase 2 of ozone implementation guidance and PM <sub>2.5</sub> implementation guidance
New draft NAA NSR rule revision for internal DAQ review that incorporates Appendix S changes and addresses 8-hour ozone and PM <sub>2.5</sub> .	<b>3 months</b> after EPA releases guidance
Outreach/Review of Appendix S, 8-hour ozone, and PM <sub>2.5</sub> changes for external stakeholders	<b>4 months</b> after EPA releases guidance
Draft rules for stakeholder review	<b>5 months</b> after EPA releases guidance
State/Board Approval for Comment	<b>7 months</b> after EPA releases guidance
Administrative: State Final Approval	<b>11 months</b> after EPA releases guidance
UDAQ Submits Document to EPA	<b>12 months</b> after EPA releases guidance
SIP Revision due to incorporate NSR Reform Provisions	January 2, 2006

Note: At this point in time, UDAQ does not believe that we will be able to submit the NA NSR rule revisions to EPA by the January 2, 2006 deadline. The amount of work that will be required to adopt the NSR reform provisions into R307-403 will not be clear until we are able to review EPA's revisions to Appendix S.

## Schedule for the Utah Mercury SIP: 8/31/05

The table below identifies some of the more significant milestones in developing the Mercury SIP.

<b>Milestone</b>	<b>Anticipated Completion Date</b>
Workshop at Region 8 to clarify Hg SIP requirements	August 2005
Identify Appropriate Stakeholders	September 2005
Meet with Stakeholders to Develop Draft SIP	October 2005 – February, 2006
Refine Draft based on Stakeholder Input	March – May, 2006
Air Quality Board Propose for Comment	June, 2006
Work with Stakeholders and EPA to Revise in response to comments received	July – September, 2006
Air Quality Board Approval	October, 2006
Revised SIP submitted to EPA	November, 2006

## Schedule for the 8-hr Ozone Maintenance Plan (8/31/05)

The table below identifies significant milestones in developing the 8-hr Ozone Maintenance Plan.

<b>Milestones</b>	<b>Comments</b>	<b>Anticipated Completion Dates</b>
Receive Inventory Preparation Plan (IPP) guidance	Based on latest estimate of receipt of Phase II, which will include RE guidance.	Due from EPA by 8/31/2005
Submit IPP and Maintenance Plan methodology to EPA		September 30, 2005
Complete Emissions Inventory	Most inventories are complete with the exception of point source	September 30, 2005
Development of Draft Maintenance Plan	Draft has already begun on some sections	November 2005 - April 2006
In-house review of Draft Maintenance Plan		May 2006 - June 2006
Compile TSD's		July 2006
Draft Maintenance Plan to AQ Board to propose for public hearing		September 2006
Final AQ Board action		November 2006 – December 2006
Submit Plan to EPA		December 2006

**The 8-hr ozone maintenance plan is due to EPA by April 15, 2007.**