

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

FY 2008 PPA

1. Develop and implement appropriate SIPs for all areas of the state.

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.
 - 1) Initial PM_{2.5} area designations to EPA by December 18, 2007.
 - 2) Revised Regional Haze SIP to EPA by December 17, 2007.
- b. All measures contained in the SIP approved by the Air Quality Board are fully implemented.

2. Develop and improve appropriate inventories.

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.

3. Continue to meet federal requirements for PSD increment tracking.

Measures:

- a. Increment consumption for major sources is tracked as permits are issued.

4. 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.

Measures:

- a. The annual Monitoring Network Review is completed and submitted to EPA by June 30. Evaluate monitoring network to reflect recent changes in funding and national monitoring requirements to optimize the network.
 - b. The PM2.5 monitoring network is maintained and operated as appropriate funding is received from EPA.
 - 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 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.
 - g. DAQ will prepare and submit to EPA an appropriate response to each identified NAAQS violation.
5. 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.^{ASB}
 - c. The work program for the AHERA Toxic Substances Compliance Monitoring Grant is continued. The AHERA Grant Work Plan approved by EPA Region VIII (attached) will be the environmental measure of success for the Utah AHERA Program.
6. 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 (attached) will be the environmental measure of success for the Utah Lead-Based Paint Certification, Accreditation and Work Practices Program.^{LD}

- b. Support the EPA Strategic Plan and the EPA Region VIII goal to eliminate childhood lead poisoning as a public health concern by reducing to 0 the number of cases of children (aged 1-5 years) with elevated blood-lead levels ($>10 \mu\text{g}/\text{dl}$) by 2010.
 - c. Support the EPA Strategic Plan and the EPA Region VIII goal to reduce to 28 percent the difference in the geometric mean blood lead level in low-income children 1-5 years old as compared to the geometric mean for non-low-income children 1-5 years old by 2010.
7. 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.
8. Continue issuing approval orders for new sources and modifications of the existing approval orders.

Measures:

- a. Air quality modeling is completed to ensure the protection of the NAAQS and PSD increment ceilings in Class I and Class II areas.
 - b. 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.
9. 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.
10. Maintain the small business assistance program (SBAP) to actively assist small businesses to comply with rules of the Board.^{SBA}

Measures:

- a. Educational Assistance is offered to all small businesses affected by adopted NSPS and MACT standards.
 - b. As appropriate, the Small Business Compliance 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 Compliance 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.
11. 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.
12. 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.
13. 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.
 - e. DAQ staff participates 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 based on available resources.
 - f. The work to conduct community outreach and analysis concerning air toxics issues is completed based on DAQ needs and available resources.
14. Continue to submit data to EPA as required by EPA.

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 are 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.
15. Respond to questions from the public regarding air quality issues.

Measure:

- a. Ambient air quality data is provided to the AirNow and EnviroFlash Programs.

EPA's Portion of the PPA

- 1. EPA Region VIII will work with other affected EPA offices when appropriate to consider various approaches to addressing specific issues that impact 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.

Items Related to DAQ Planning Branch Activities

- 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 work with EPA HQ when appropriate to help elevate issues to the national level that are uniquely western issues.
- 3. EPA Region VIII will give 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 will make 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.
6. EPA Region VIII and UDAQ will work together to pursue any feasible early action initiatives for PM_{2.5}.
7. Following review of the Federal Annual Air Quality Report, EPA Region VIII and UDAQ will work together to develop appropriate actions addressing each identified NAAQS violation for any criteria pollutant.

Items Related to DAQ Permitting Branch Activities

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

Items Related to DAQ 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 and MACT national initiatives in the refinery, coal-fired power plant, Portland cement, sulfuric and nitric acid and glass industry sectors, a national leak detection and repair (LDAR) initiative, and a regional oil and gas industry sector initiative.
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.

Items Related to DAQ Monitoring Activities

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.