

Output or Activity	Final Status	EPA Comments /Questions
Objective 1: Protect human health by reducing emissions of fine particulate matter (PM2.5, ozone, and other pollutants)		
1. Ecology will coordinate with EPA and the LAAs on PM2.5 designation recommendations and will provide the recommendations to EPA by December 18, 2007.	Ecology provided recommendations for all areas of the state for PM2.5 by December 18, 2007 with the exception of a portion of Pierce County. Ecology submitted supplemental information on Pierce County on July 25, 2008.	
2. Ecology and the LAA’s will submit to EPA New Source Review (NSR) rules that are federally approvable, consistent with federal rules/guidance, and to the extent reasonable, consistent state-wide. a) Ecology submits WA New Source Review Phase 2 (also known as EPA Phase 3) rules revision (pertaining to minor source program and previously identified SIP deficiencies) by a mutually agreed upon date.	Ecology started process of revising NSR rules in spring 2009. Anticipated adoption date of spring 2010. Primary focus of rule revision is to update SIP deficiencies. Ecology is coordinating closely with EPA staff and key stakeholders in resolving SIP deficiencies.	Ecology withdrew its previously submitted NSR SIPs on November 24, 2008.
3. b) EPA submits to Ecology and LAAs timely comments on draft New Source Review rules, including the extent to which they are consistent with EPA rules and guidance, federally approvable, and consistent state-wide. Comments shall be submitted sufficiently in advance to allow resolution of significant issues within regulatory timelines.	Ecology intends to submit completed rules package for inclusion in the SIP after rule adoption. Ecology coordinated with the LAAs to withdraw the 2004 SIP submission in fall 2008.	
4. Ecology will complete the review of BART modeling analysis and issue regulatory orders to sources that meet BART requirements to install controls as part of the development of the Regional Haze State Implementation Plan (RH SIP). Pending the availability of funding for RH SIP work, Ecology will continue RH SIP development, coordinating with EPA, LAAs and other stakeholders as necessary. If funding is not provided for RH SIP work, EPA will lead the development of a federal implementation plan (FIP) on how to meet the critical requirements of the visibility and regional haze program in Washington, and coordinate with Ecology, LAAs and other stakeholders periodically and as necessary	Ecology is finalizing BART documents and will go through the public hearing process in fall 2009. Ecology has had numerous consultations with the Federal Land Managers and shared draft documents with EPA RX. Work on the regional haze SIP is underway and Ecology will have a draft SIP to share with EPA by January 2010.	Ecology has coordinated with EPA on the RH SIP. However, information exchange on the RH SIP progress has not been sufficient for EPA to determine if ECY is on track to meeting SIP requirements and if the SIP is approvable. EPA issued a “finding of failure to submit” to Ecology for its RH SIP in January 2009. From that date, EPA has two years to prepare a FIP for Regional Haze if EPA does not receive an approvable SIP by January 2010. A better exchange of information would help EPA to determine if Ecology is on track to meeting the RH requirements in the SIP or identify if there are any major issues that would result in an SIP that is not approvable. EPA and Ecology should have monthly check in meetings starting in October 2009 and Ecology in coordination with

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EPA RH staff should submit a SIP Development Plan with milestones for the development of the major elements of the RH SIP.

<p>1. Ecology and the LAAs will develop initial SIP Development Plans for each SIP submittal, as required by the SIP Process Improvement Project report, approximately 6 months before EPA review is needed. The SIP Development Plan will include schedules that will be negotiated with EPA. EPA will make best efforts to review and comment on draft SIP revisions prior to the public comment period.</p>	<p>No activity on this task during the current reporting period as there have not been any SIP submittals.</p>	<p>See #3 below – After Ecology and EPA work to update priority SIP list and staff contacts for each project have been established, Ecology staff should work with appropriate EPA staff to develop SIP development plans for each project.</p>
<p>2. Ecology, EPA and the LAAs coordinate to discuss designation criteria and guidance documents, and potential designation recommendations for the State of Washington, particularly for areas with high 2003-2005 design values.</p>	<p>This work was fully accomplished with the recommendations submitted to EPA in December 2007, February 2008, and July 2008 for PM 2.5 designations.</p>	<p>EPA appreciates Ecology’s coordination on this.</p>
<p>3. EPA, Ecology and the affected LAAs will communicate at unit manager/section manager level at least twice per year to discuss the status of pending SIP submittals, and will coordinate on prioritizing SIP review and approvals. EPA will share/update SIP workload status, and Ecology will inform EPA of any new SIP submittals at least twice a year through communication between the EPA and Ecology SIP coordinators.</p>	<p>Ecology has been communicating regularly with EPA and the LAAs regarding the status of the existing NSR rule SIP submittal. Ecology and EPA asked the LAAs to withdraw that submittal and that was done in the fall of 2008.</p>	<p>Ecology and EPA should work together to produce an updated list of SIP work anticipated over the next several years and reach agreement on a priority ranking for this work. An updated list should be prepared and completed by the end of the 2009 calendar year.</p>
<p>4. Ecology and EPA will flag and submit natural event in accordance with the Natural Events Policy and the NEAP.</p>	<p>Ecology monitors these on an ongoing basis. There have been no smoke events that would have qualified as an exceptional event this reporting period.</p> <p>We placed a preliminary flag on a windblown dust event monitored at Burbank on July 10, 2008 (168 µg/m3). That flag will be submitted in September 2008 along with the rest of AQS data.</p> <p>Note that because the Natural Events Policy has been superseded by the Exceptional Events Rule (EER), we now follow EER requirements.</p>	

<p>5. Ecology and the LAAs will, with EPA support, declare air advisories, implement woodstove curtailment programs and voluntary measures such as smog watch and burn curtailments to mitigate ambient air quality concentrations and advise the public of periods of impaired air quality.</p>	<p>Ecology has been coordinating with EPA and the LAAs to declare air advisories and woodstove curtailments. In 2007 the authorizing statute for calling curtailments changed to match the new PM2.5 standard and Ecology and LAAs developed new protocols. Those were successfully applied during the 2008/2009 winter.</p>	<p>EPA will continue to work with tribes to encourage voluntary curtailment on adjacent tribal lands. In addition we will be looking at updating the FARR to include similar provisions.</p>
<p>6. Ecology will continue to operate and provide ongoing support for real-time permit management, public information, and air quality advisory systems for outdoor burning.</p>	<p>Ecology continues to run a comprehensive permitting system for outdoor burning, including agricultural burning.</p>	
<p>7. EPA will serve as regional smoke coordinator by working with other northwest states and Tribes to improve smoke management coordination and tools.</p>	<p>No relevant activity during this reporting period.</p>	
<p>8. Ecology and the LAAs will update and revise their rules and regulations as necessary or appropriate to maintain effective air quality programs and submit timely SIP revisions to EPA.</p>	<p>No relevant activity during this reporting period.</p>	<p>Ecology has not submitted updates to its SIP to meet the “infrastructure” elements required by CAA section 110 following EPA’s promulgation of the 1997 PM2.5 and 8-hour ozone NAAQS. EPA made a finding of failure to submit the PM2.5 SIP in October 2008 starting another 2-year FIP clock. Ecology should make a renewed effort to submit these SIPs well before the FIP clock expires and may want to address EPA’s most recent NAAQS revisions at the same time (i.e. 2006 PM2.5 NAAQS, 2008 O3 NAAQS). Ecology has missed the due date of September 21, 2009 for submittal of and infrastructure SIP for the 2006 PM2.5 NAAQS.</p>
<p>9. Ecology will secure Attorney General’s Office review of Ecology regulations to be submitted for inclusion in the SIP, prior to sending to EPA for review.</p>	<p>No relevant activity during this reporting period.</p>	
<p>10. The LAAs, with assistance from EPA and Ecology, will evaluate ways to secure appropriate legal review of local regulations to be submitted for inclusion in the SIP.</p>	<p>No relevant activity during the reporting period.</p>	<p>This has not been an issue during the reporting period.</p>

OBJECTIVE 2: Reduce emissions of, exposure to and health risk from airborne toxics through programs that target toxic diesel emissions reductions to areas of greatest health impact; target toxic smoke reduction strategies that provide the greatest health benefits; and reduce industrial emissions (not just toxics) with simpler permit processes and increased

partnership with businesses to reduce impacts of air pollution.		
1. Ecology will review National Emission Inventory (NEI) data within six months of receipt. The 2008 NEI plan (the every three-year comprehensive inventory) will be implemented on a schedule to be completed by June 1, 2010.	Ecology will submit required data by June 1, 2010. Ecology staff will review NEI data during EPA review period of July 13 – Nov. 1, 2010.	Ecology is on schedule and gearing up for the 2010 submittals.
2. Ecology will, with the cooperation of the LAAs, prepare toxics Emissions Inventories (EI) annually and make available to Region 10	In cooperation with the LAA's Ecology staff submitted the 2006 point source toxics inventory by June 1, 2008 per federal rule. Ecology submitted the 2007 data by June 1, 2009.	Ecology is on schedule for this.
3. Ecology will produce a quarterly toxics newsletter regarding statewide toxics initiatives.	The toxics newsletter was not published during this PPA term due to competing work priorities. The air toxics coordinator has instead put together an abbreviated list of updates in the air toxic world and distributes this by email on a semi-annual basis.	Ecology submits updates and hosts regional air toxics calls with EPA every other month.

Ecology in partnership with the LAAs will:

1. Operate monitoring stations, collect and evaluate data for the National Air Toxics Trends Site (NATTS).	Ecology staff has collected samples from the Beacon Hill NATTS every six days since 2000. Samples are analyzed by the Eastern Research Group (national contract lab). Data are quality assured and entered into the Air Quality System (AQS) database by Ecology.	
2. Continue to collect toxics monitoring data	Ecology staff continues to collect samples from the Beacon Hill NATTS every six days. The resulting data are evaluated and entered into AQS.	
3. Collect toxics emission inventory data annually	In cooperation with the LAA's Ecology staff submitted the 2006 point source toxics inventory by June 1, 2008 per federal rule. Ecology submitted the 2007 data by June 1, 2009.	Ecology is on schedule for this.
4. Review available NEI data, and submit changes in a timely manner	Ecology staff will review NEI data during EPA review period of July 13 – Nov. 1, 2010.	Ecology is on schedule for this.
5. Continue the school bus retrofit program	During this PPA term Ecology and Washington Clean	

	Air Agencies installed retrofit emission control technologies approximately 2,300 school buses. The cumulative total of school buses and other public owned diesel equipment is 7,447. Ecology has retrofitted all school busses that can be retrofit in the State of Washington.	
6. Develop and implement diesel reduction projects through the West Coast Diesel Collaborative (WCC).	Ecology did not receive any WCC funding for 07-09. Ecology has completed all previously WCC funded projects.	
EPA will:		
1. Provide National Emissions Inventory (NEI) data		At the 2008 Air Toxics Summit and through regular Air Toxics calls, EPA provides NEI data, guidance on national toxics policies and programs and background information and outreach from NATA and other states and national programs. We have also provided training at the Air Toxics Summit on these items. We appreciate Ecology's assistance in coordinating the regular calls.
2. Provide guidance on national air toxic policies and programs		
3. Provide background information and outreach from NATA and other states and national programs		
Reporting		
1. For major and synthetic minor sources, Ecology, the LAAs and EPA will enter Subpart 63 MACT sources into the AIRS Facility Subsystem (AFS). Ecology and the LAAs will report the Minimum Data Reporting (MDRs) elements in addition to the applicable subparts	Ecology has been entering these sources into AFS and reporting accordingly	
2. Ecology will submit emission reports for point sources of Hazardous Air Pollutants (HAPS) to the NEI via EPA's Central Data Exchange (CDX) by September 1, 2007. Ecology will continue to request reporting of all HAPS species and will submit what we receive	In cooperation with the LAA's Ecology staff submitted the 2006 point source toxics inventory by June 1, 2008 per federal rule. Ecology submitted the 2007 data by June 1, 2009.	Ecology collects toxics data as required by their TAP program. Not all the LAAs submit the HAPs data to Ecology. Ecology reports what it receives.
Objective 3: Address global climate change by reducing emissions of greenhouse gases from Washington State		
Outputs:		
1. Ecology will coordinate with the LAAs and CTED to complete a state-wide inventory of greenhouse gas emissions based on CTED's existing emissions inventory work.	Ecology coordinated with CTED to develop a 1990 baseline GHG emissions inventory; Ecology has also developed a 2007 statewide GHG emissions	

	<p>inventory. The next statewide GHG emissions inventory is due in 2010.</p>
<p>Ongoing Activities:</p>	
<p>1. Ecology will review and enhance the Washington State greenhouse gas emission inventory.</p>	<p>Ecology will continue to refine and update the statewide GHG emissions inventory on a biannual basis. Updates are not due until 2010.</p> <p>Ecology is also in the process of developing a mandatory reporting rule for GHG emissions. This rule will require reporting of calendar year 2009 emissions starting in 2010. The final rule will be adopted by the end of 2009.</p>
<p>2. Ecology will continue to implement the California motor vehicle emission standards.</p>	<p>This work is occurring on an ongoing basis. ECY and DOL are developing registration data tracing to monitor/enforce in WA implementation of CA standards for appropriate 2009 MY vehicles. ECY updated the rules to reflect CA updates and include the green vehicle labeling standards at the end of 2008.</p>
<p>3. Ecology and the LAAs will provide support to the West Coast Governors’ Global Warming Initiative and the related West Coast Diesel Collaborative.</p>	<p>Ecology continues to participate actively in the West Coast Diesel Collaborative. The West Coast Governors’ Global Warming Initiative has been supplanted by the Western Climate Initiative (WCI). WA is a founding member of the WCI and co-chairs this group.</p>
<p>4. Ecology, in coordination with CTED, and business, governmental and environmental stakeholders, will develop strategies to meet state climate change goals.</p>	<p>This work is happening on an ongoing basis through the work of the WA Climate Action Team (CAT) and WA’s participation in the WCI. The CAT delivered a report to the legislature in December 2008 with draft recommendations. Those were not enacted into law, but in May 2009 the Governor issued an Exec. Order to implement some GHG strategies. Coordination with CTED (now Dept of Commerce) continues actively under the LCFS and VMT tasks.</p>

Objective 4: Reduce, limit and manage emissions – to protect public health and preserve the environment – through effective and efficient air quality permitting programs.

<p>1. Ecology and LAAs will update regulations and delegations to incorporate new or revised NSPS and MACT (as determined by those agencies).</p>	<p>Ecology has not updated its state New Source Review regulations since February 2005. Ecology is evaluating new NSPS and MACT as part of the ongoing NSR rule revision.</p>	<p>Ecology has not submitted an updated delegations request since 2001. New MACTS have been adopted by rule into the WAC, but Ecology has not submitted the delegations request. Note, the updated delegation of MACT/NSPS is not part of the SIP and should not be submitted as a SIP revision. However, these should be submitted to Madonna Narvaez of the Federal Delegated Air Programs Unit for review.</p>
<p>2. Ecology and EPA will update the PSD delegation to incorporate changes as needed (as determined by receiving agency). LAAs receive delegation for PSD avoidance mechanisms in an expeditious manner.</p>	<p>The PSD delegation agreement has not been updated since February 2005. Ecology and EPA are currently working on updating the delegation agreement to address PM2.5 requirements for PSD.</p>	<p>Work has been delayed. EPA will submit a new draft delegation agreement by the end of 2009.</p>
<p>3. EPA will process delegation requests within three months after they are received</p>		<p>EPA has not received any delegation requests within three months or as appropriate.</p>
<p>4. Ecology, LAAs and EPA will participate in the Air Operating Permit Program review being conducted by EPA</p>	<p>Ecology participated in the AOP Program Review last performed by EPA in 2006. In response to the Program review report, Ecology committed to forming an internal workgroup to develop a guidance document or template Statement of Basis to be used in Ecology’s permit writer’s so that all required elements are addressed in the basis.</p> <p>Ecology has also participated in the State Review Framework. Ecology has committed to the following:</p> <p>More thoroughly documenting activities used to satisfy Full Compliance Evaluations performed at AOP sources during the reporting period</p> <p>Evaluate violations to identify those which meet the</p>	<p>Ecology committed to creating a workgroup and some guidance to resolve some of EPA’s concerns indentified in the Sept 2006 program review report, but EPA has not heard how that is going on for some time now. Are locals going to respond too? Ecology participated in a second round program review in early 2009 but EPA has not yet issued the report for that review.</p>

	<p>High Priority Violation criteria and follow through with the appropriate response to those violations, Evaluate the economic benefit of the non-compliance when recommending penalties for violation at AOP sources, and</p> <p>Participate in additional training on how to determine and document high priority violations and calculate economic benefit when recommending penalties.</p> <p>So far, individual Ecology programs (ERO, IND and NWP) have individually been working on these issues and Ecology awaits the opportunity to participate in the training identified above.</p>	
5. Ecology will continue to advance the project to incorporate allowable emissions into the emissions inventory	Future permits in Ecology jurisdiction will include allowable emission information. The new Ecology web-based emission inventory system will include fields for allowable emission information.	We have not had any actions in the last year to determine how well this is working.
6. EPA will lead an effort to establish more effective permit coordination and permit issue communication protocols.		We should revise this objective to be clearer in the next PPA or eliminate it.
7. EPA and Ecology will work collaboratively to improve the permitting process by increasing regulatory flexibility and reducing transaction costs while maintaining environmental protection.	Ecology works to continuously improve the permitting process. This is an area for improvement with EPA in timely review of Ecology permits and keeping in mind the environmental benefit of ... Most of that work has occurred in-house and there has not been a discrete effort to work with EPA. However, as opportunities for this work arise, Ecology continues to be willing to work with EPA.	We should revise this objective to be clearer in the next PPA or eliminate it.
Ongoing activities:		
1. Administer air quality permitting programs for commercial and industrial sources: <ul style="list-style-type: none"> a. Preconstruction permits for new major sources or major modifications (PSD, NAA-NSR) as per the delegation agreement. 	<p>This activity is ongoing. Ecology continues to issue PSD, NSR, and NOC permits in accordance with state and federal laws and regulations.</p> <p>Ecology administers an AOP program for 27</p>	

<p>b. Preconstruction permits for new non-major sources or non-major modifications (Notices of Construction, General Orders).</p> <p>c. New Source Performance Standards and NESHAPs.</p> <p>d. Air Operating Permits for existing affected sources.</p>	<p>facilities; the LAAs administer the program for another 98 applicable sources. Implementation includes issuance of Air Operating Permits, renewal of these permits at least every five years, permit reopening to include new applicable requirements prior to permit renewal, full compliance evaluations and other activities identified in the Compliance Assurance Agreement.</p>	
<p>2. Administer air quality permitting programs for temporary/portable commercial and industrial sources. Ecology and the LAAs may develop General Orders for small industrial sources where appropriate.</p>	<p>We continue to use General Orders as a way of expediting NOCs for small sources and relieving regulatory burden. We currently have general orders for package boilers, rock crushers, emergency backup generators, autobody shops, and cement batch plants. Both the rock crusher and autobody shop general orders are being used regularly by applicants in Ecology jurisdictions as alternatives to the standard NOC process.</p>	
<p>3. Administer air quality permitting programs for outdoor burning (agricultural burning, land clearing, fire training, etc.)</p>	<p>Ecology continues to administer these programs on an ongoing basis. We make burn calls daily during the burn season and post decisions prior to 9 am. Burn decisions are based on an evaluation of monitoring data and meteorological conditions; we only allow burning when conditions are sufficient to disperse smoke and keep ambient concentrations low.</p>	<p>Ecology continues to administer these on an ongoing basis.</p>
<p>4. Continue respective commitments to communicate openly, timely and directly on permitting issues.</p>	<p>Ecology continues to communicate with EPA and LAAs in an open, timely and direct way.</p>	<p>We should revise this objective to be clearer in the next PPA or eliminate it.</p>
<p>Ecology in partnership with the LAAs will:</p>		
<p>1. Report AOP activity using the <i>Permit Register</i> (FYI only).</p>	<p>This work is happening on an ongoing basis.</p>	
<p>2. Post BACT / LAER determinations to the Clearinghouse within 3 months of final permit issuance (for major actions).</p>	<p>Ecology believes that it is up to date with entering information into the BACT/LAER clearinghouse.</p>	<p>EPA appreciates that Ecology is making efforts to enter determinations into the BACT/LAER Clearinghouse in a timely fashion.</p>
<p>3. Forward to partners: any customer surveys, compliance reviews, tracking reports directly related to permitting programs.</p>	<p>This work is occurring on an as-needed basis.</p>	
<p>4. Submit major point source emissions data to the National</p>	<p>Per federal rule, Ecology submitted the point source</p>	<p>Emissions have been submitted on time for 2006 and</p>

Emission Inventory (NEI) by June 1, 2007 for 2006 and by June 1, 2008 for 2007.	emissions data to the NEI by June 1, 2008 for 2006 and submitted by June 1, 2009 for 2007.	2007 NEIs.
Objective 5: Maintain an effective compliance assurance program that prevents and reduces air pollution (Jeff’s group)		
Compliance Assurance Agreement		
1. EPA, in cooperation with Ecology and the LAAs, will update the Compliance Assurance Agreement as needed to incorporate new commitments and requirements.	No updates to the Compliance Assurance Agreement have been needed during this reporting period.	
2. Ecology and LAA compliance programs will continue to follow-up with action plans developed as a result of EPA’s State Review Framework.	Ecology has delivered timely on current commitments to EPA under the SRF. Economic Benefit action plan is underway with EPA, ECY and the LAAs.	This is important work and we appreciate Ecology’s efforts to follow up on these plans particularly on those elements related to determining economic benefit.
3. EPA, Ecology, and LAAs will carry out their respective obligations under the Compliance Assurance Agreement (PSD, Title V, Synthetic Minors, etc).	Ecology is up to date on carrying out its obligations under the Compliance Assurance Agreement.	
Delegated Programs at Non-Title 5 Sources		
1. Ecology and the LAAs will adequately implement as many delegated programs as they can. When adequate resources for full implementation are not available, relative priorities will be established in collaborative planning with EPA, and it is understood that those priorities will likely vary from agency to agency. State and local agencies may submit their prioritization plans to EPA. EPA feedback will be prompt (the collaborative planning meetings are appropriate places for this exchange).	Ecology continues to implement delegated programs per the terms of the delegation agreements.	
2. EPA, Ecology, and the LAAs will periodically review and discuss compliance and enforcement program trends in federally delegated programs. EPA will take the lead in identifying existing sources of data that will inform our periodic review (the collaborative planning meetings are appropriate places for this exchange).	Ecology actively participates in periodic discussions such as the HPV teleconferences, and the SRF evaluation and follow-up process.	
Minor Sources and Area Sources		

<p>1. Ecology and LAAs are encouraged to share information about their minor source and area source programs and priorities (the collaborative planning meetings are appropriate places for this exchange). EPA agrees that minor and area sources programs are crucial to achieving and maintaining clean air, and acknowledges the need for state and local agencies to prioritize limited resources for maximum environmental benefit.</p>	<p>Ecology has a robust and effective minor source compliance program involving the management of approximately 500 small businesses in rural Washington.</p>
<p>Ongoing Activities</p>	
<p>1. For sources and activities that are subject to the Compliance Assurance Agreement, Ecology and local agencies will conduct their compliance programs in accordance with that Agreement as it exists during the term of this PPA.</p>	<p>Ecology is conducting its compliance program in accordance with the terms of the Compliance Assurance Agreement.</p>
<p>2. Violations determined to be high priority violations will be resolved in accordance with the EPA “Timely and Appropriate Enforcement response guidance for HPVs,” and as outlined in the Compliance Assurance Agreement.</p>	<p>Ecology makes every attempt to identify HPVs, report them to EPA, and resolve them in accordance with appropriate guidance. We frequently consult with EPA on difficult cases, and we have made some recent adjustments to our program as a result of SRF recommendations.</p>
<p>3. Ecology, the LAAs and EPA will continue periodic (approximately bi-monthly) conference calls to discuss high priority violations as well as policy and strategy issues.</p>	<p>Ecology actively participates in the HPV calls that are hosted by EPA.</p>
<p>4. EPA is responsible for conducting compliance assistance and enforcement activities in Indian Country.</p>	
<p>5. EPA is responsible for non-delegable standards, activities, and programs (for example, chlorofluorocarbons) statewide, including complaint response, inspections, and priority enforcement actions.</p>	
<p>6. EPA will continue to perform direct inspection and enforcement work with respect to national priorities (in accordance with the Compliance Assurance Agreement) or as requested by state or local agencies.</p>	

Reporting

1. All agencies will fulfill reporting requirements contained in the Compliance Assurance Agreement.	Ecology has been timely and complete in required reporting.
2. To the extent possible, and as time allows, all agencies will attempt to quantify emission reductions achieved through enforcement actions against High Priority Violators (HPVs). One approach might be to use EPA’s case conclusion worksheet.	This goal has not been pursued by Ecology or EPA during the reporting period.
3. Program managers of Ecology and the Local Air Agencies will ensure the accurate and complete reporting of AFS data and will ensure that the reports out of AFS are accurate for their agencies.	Our AFS data is high quality. During the 4 quarters completeness averaged 90.5. During the final three quarters completeness averaged 94. This data lags on quarter.
4. EPA will provide timely information regarding enforcement efforts if they have the potential to impact permitting efforts as part of the efforts to establish more effective permit communication protocols.	One example of this is that EPA has been very helpful in communicating its enforcement activities in the non-delegated 112r program.

Objective 6: In order to characterize the health consequences of air pollution in Washington, the following work will be done. It will be accomplished by collecting the data that have the greatest opportunities to benefit public health and increasing the public’s understanding of the health effects and cost of pollution.

Outputs

1. Ecology collaborates with the LAAs to complete and submit to EPA an annual monitoring network review by July 1 of each year. EPA will respond by August.	Completed on time during this reporting period.	ECY continues to do submit their monitoring review on time.
2. Ecology, EPA, and the LAAs will use electronic communications, including web pages to inform and interact with the public.	This activity is ongoing.	
3. Ecology, EPA, and the LAAs will use data resources to support communication on, and understanding of, identified air pollution problems.	This activity is ongoing.	
4. Ecology will manage contracts to operate the air quality models known as MM5, AIRPACT, and Clearskies. Ecology will give the air quality programs in Oregon, Idaho, and Alaska an opportunity to review the contract workplans prior to implementing them.	Contract oversight has moved to Idaho DEQ. Ecology maintains a consultative role and is active in the development of NW AIRQUEST tools.	Please provide EPA with a report on funding for the SFY 09 contract for MM5, AIRPACT, and Clearskies.

Ongoing Activities

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1. Ecology and the LAAs will operate statewide National Air Monitoring Site (NAMS)/ State and Local Air Monitoring Site (SLAMS) network, according to 40 CFR. Part 58.	Ecology and Washington’s local air agencies operate statewide State and Local Air Monitoring Site (SLAMS) network according to 40 CFR Part 58. In addition, Ecology operates the EPA required NCORE site. The entire Washington network is submitted to the public and EPA for review. There were not public comments.	The review has been completed. Note, we no longer have NAMS sites, all sites are either SLAMS or NCORE. In the next PPA, we will correct this.
2. Ecology will submit monitoring data to AQS within 90 days of the end of each calendar quarter.	Ecology is submitting the data within the required timelines.	Yes, Ecology has been timely in submitting data to AQS. We appreciate this timeliness.
3. EPA will review and approve an annual monitoring network review within 90 days of submission.	EPA is reviewing Washington’s 2009 network and final approval is pending. Data from the Washington network is submitted to EPA’s AQS and AIRNow.	EPA now has 120 days to respond
4. Ecology will maintain quality assurance program for ambient data as required by 40 CFR Part 58, Appendix A.	Ecology maintains a Quality Assurance Project Plan (QAPP) for our ambient air monitoring network. This plan covers the operation of air monitoring sites and data collection, QC and QA activities for criteria pollutants. Separate QAPP is maintained for toxics and speciation data collection efforts.	Generally, Ecology runs a solid QA program for ambient data. We have one comment on audits – see below.
5. EPA will provide annual quality assurance audits as required by 40 CFR Part 58, Appendix A.	Ecology is submitting our QA reports to Chris Hall.	Please take a look at the frequency of precision checks for gas analyzers. These should be occurring every two weeks but have happened less frequently. The EPA contact for this is Chris Hall
6. Ecology will, in collaboration with the LAAs, collect data and prepare emission inventory and air monitoring databases to support air quality modeling.	This activity is ongoing.	
Reporting		
1. Ecology will submit AQS data within 90 days of the end of the quarter.	Ecology is submitting the data within the required timelines.	Ecology has been timely with submittal of AQS data
2. Ecology will submit fast-track ozone daily during ozone season.	Ecology does not do this activity and it appears to be out of date; the implementation of AirNOW negated this need.	This is no longer a requirement, we should revise this objective in the next PPA
3. Ecology will prepare quarterly Quality	This activity is ongoing. The QA reports have been	We have not seen any QA reports from Ecology. If

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Assurance (QA) reports.	sent to EPA quarterly and annually since 2002. They have been sent to Keith Rose and Jan. Since midterm PPA report, we have since been including Chris in our mailings.	Ecology is preparing these reports, we would like to review them. Please send to Chris Hall.
4. Ecology will notify EPA of exceedances of ambient air standards within 24 hours of receiving valid data.	Ecology will also start again notifying EPA (Gina) of exceedances of ambient air standards within 24 hours of receiving validated data.	We should revisit this item in the next PPA. EPA does not check AIR NOW everyday but it is important to be in timely communication regarding exceedances. Is there another way we can do this?
5. Ecology will provide ambient data upon request.	Ecology submits data in near-real-time to EPA's AirNOW for ozone and particles. Ecology will in the future submit its ambient air quality data to the Northwest Exchange Node.	