

Output or Activity	Mid-term Status	EPA Comments /Questions
Objective 1: Protect human health by reducing emissions of fine particulate matter (PM2.5, ozone, and other pollutants)		
<p>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.</p>	<p>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 discussed the need to submit the recommendation for that portion of the state late with EPA, and coordinated with EPA staff to make that recommendation in February 2008.</p>	
<p>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.</p> <p>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. This date shall be subsequent to EPA's approval of Ecology's previously submitted NSR rules.</p> <p>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.</p>	<p>Ecology has not yet begun the process of developing new NSR rules; we are preparing to open the rulemaking in late fall 2008 with a planned adoption date of Summer 2010. In developing these rules, Ecology will coordinate with EPA to address SIP deficiencies. Ecology will then coordinate with the LAAs and EPA regarding a date for submittal of the new rules for inclusion in the SIP.</p> <p>In the meantime, Ecology will coordinate with the LAAs to withdraw the 2004 SIP submission. Ecology will withdraw the 2004 SIP submission by November 15, 2008.</p> <p>This output is not yet applicable as Ecology has not started the process of the revising the rule. Ecology has met with EPA staff in preparation for opening the rule and will coordinate closely with EPA staff once the rulemaking is underway.</p>	<p>Since Ecology's previously submitted NSR SIP is not approvable, Ecology should withdraw this submittal by December 1, 2008.</p>
<p>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</p>	<p>Ecology received funding for the work to develop and complete the RH SIP and has been actively engaged in that activity for the duration of the</p>	<p>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 SIP is</p>

<p>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</p>	<p>reporting period. We are currently completing review of the BART submissions from eligible sources and will be making final determinations in the Fall of 2008. As part of the RH SIP planning work, we meet on a regular basis with the FLMs and coordinate with EPA staff. Ecology also coordinates efforts with the LAAs for BART sources that are within their respective jurisdictions.</p> <p>As we move more into active development of the RH SIP, Ecology will have more frequent meetings to update and coordinate with EPA staff.</p>	<p>approvable. EPA intends to issue a finding of failure to submit RH SIPs in Oct 2008. From that date, EPA has two years to prepare a FIP for Regional Haze. We would need to have a RH SIP reviewed by Oct 2009 at the latest to determine if we would need to move forward with a FIP. 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 EPA RH staff should submit a SIP Development Plan with milestones for the development of the major elements of the RH SIP.</p>
<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 in this area 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 process has been accomplished with the recommendations submitted to EPA in December 2007, February 2008 for Pierce County.</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</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 as the NSR rules are about to be revised and there will eventually be another SIP submittal to replace it.</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>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 will work with EPA to develop an updated list of SIP work anticipated over the next several years.</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 status for calling curtailments changed to match the new PM2.5 standard; as a result Ecology and the LAAs have been working to develop new protocols</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</p>		<p>Ecology has not submitted updates to its SIP to meet the “infrastructure”</p>

<p>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>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)</p>
<p></p>	<p>Ecology will develop a schedule as to when EPA can anticipate receiving future SIP submissions, including the section 110(a) infrastructure SIP, and SIPs to address the new PM2.5 and O3 standards.</p>	<p></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></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>
<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 toxics 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.</p>		
<p>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.</p>	<p>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.</p>	<p>Ecology is on schedule and gearing up for the 2010 submittals.</p>
<p>2. Ecology will, with the cooperation of the LAAs, prepare toxics Emissions Inventories (EI) annually and make available to Region 10</p>	<p>In cooperation with the LAA’s Ecology staff submitted the 2006 point source toxics inventory by June 1, 2008 per federal rule. Ecology will submit the 2007 data by June 1, 2009.</p>	<p>Ecology is on schedule for this.</p>
<p>3. Ecology will produce a quarterly toxics newsletter regarding statewide toxics initiatives.</p>	<p>The toxics newsletter has not been published during this period 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.</p>	<p>Ecology submits updates and hosts regional air toxics calls with EPA every other month.</p>

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 continue 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 will submit 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	As of June, 2008, Ecology and Washington Clean Air Agencies installed retrofit emission control technologies on more than 5000 school buses. The program expects to retrofit another 1500 by December, 2008.	
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

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| <p>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</p> | <p>Ecology has been entering these sources into AFS and reporting accordingly</p> |
| <p>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</p> | <p>In cooperation with the LAA’s Ecology staff submitted the 2006 point source toxics inventory by June 1, 2008 per federal rule. Ecology will submit the 2007 data by June 1, 2009.</p> <p>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.</p> |

Objective 3: Address global climate change by reducing emissions of greenhouse gases from Washington State

Outputs:

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| <p>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.</p> | <p>Ecology coordinated with CTED to develop a 1990 baseline GHG emissions inventory; Ecology has also developed a 2007 statewide GHG emissions inventory.</p> |
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Ongoing Activities:

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| <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.</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. These data will further inform WA’s GHG emissions inventory.</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 is currently updating the rules to reflect CA updates</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>and include the green vehicle labeling standards. 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 will be delivering a report to the legislature in December 2008 with draft recommendations of reduction strategies to pursue.</p>	
<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>		
<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 will be revising the regulations in 2009, and will seek to incorporate new NSPS and MACT as we determine to be appropriate.</p> <p>Ecology will also evaluate when to submit an updated delegations request to EPA at the time we evaluate incorporation of new NSPS and MACT standards into our rule.</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 are 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>This is on track to being completed. The current target is by the end of October 2008.</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 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?</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 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>	
<p>5. Ecology will continue to advance the project to incorporate allowable emissions into the emissions inventory</p>	<p>Ecology continues to advance this project, with one of the emission inventory specialist staff tasked with developing these data. Incorporating these data into our program emissions inventory is part of</p>	<p>We have not had any actions in the last year to determine how well this is working.</p>

	our new project to transition the emissions inventory to a web-based system.	
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. 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 would 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:	This activity is ongoing. Ecology continues to issue PSD, NSR, and NOC permits in accordance with state and federal laws and regulations. Ecology has issued 2 PSD permits since September 2007; 2 more are in progress and are being worked on.	
a. Preconstruction permits for new major sources or major modifications (PSD, NAA-NSR) as per the delegation agreement.	From May 06-May 08 Ecology received 197 applications for Preconstruction permits for new non-major sources or non-major modifications (includes both Notice of Construction and General Orders). Notice of Construction permits contain requirements for applicable NSPSs and NESHAPS. These applications are for the 19 counties in Ecology's jurisdiction.	
b. Preconstruction permits for new non-major sources or non-major modifications (Notices of Construction, General Orders).		
c. New Source Performance Standards and NESHAPs.		
d. Air Operating Permits for existing affected sources.	Ecology administers an AOP program for 27 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	

	<u>Assurance Agreement.</u>	
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.	We continue to administer this program, and have developed several categories for coverage under a general order as a way of expediting NOCs for small sources and relieving regulatory burden. We currently have general orders for package boilers, rockcrushers, emergency backup generators, autobody shops, and cement batch plants. Both the rockcrusher and autobody shop general orders are being used regularly by applicants in Ecology jurisdictions as alternatives to the standard NOC process.	
3. Administer air quality permitting programs for outdoor burning (agricultural burning, land clearing, fire training, etc.)	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.	Ecology continues to administer these on an ongoing basis.
4. Continue respective commitments to communicate openly, timely and directly on permitting issues.	Ecology continues to communicate with EPA and LAAs in an open, timely and direct way.	We should revise this objective to be clearer in the next PPA or eliminate it.
Ecology in partnership with the LAAs will:		
1. Report AOP activity using the <i>Permit Register</i> (FYI only).	This work is happening on an ongoing basis.	
2. Post BACT / LAER determinations to the Clearinghouse within 3 months of final permit issuance (for major actions).	There are three determinations for major actions that do not appear to have been posted to BLISS yet. We are working to make sure these are entered into the database ASAP. The actions for 2007 have been entered into BLISS.	EPA appreciates that Ecology is making efforts to enter determinations into the BACT/LAER Clearinghouse in a timely fashion.
3. Forward to partners: any customer surveys, compliance reviews, tracking reports directly related to permitting programs.	This work is occurring on an as-needed basis.	
4. Submit major point source emissions data to the	Per federal rule, Ecology submitted the point source	Emissions have been submitted on time for 2006 and 2007 NEIs.

National 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 will submit by June 1, 2009 for 2007.	
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

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| <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> |
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Ongoing Activities

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| <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> | |
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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.
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Reporting

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| 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 in great shape, as documented in the recent SRF report. |
| 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

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| 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 | This activity is ongoing. | |
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<p>to support communication on, and understanding of, identified air pollution problems.</p>		
<p>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.</p>	<p>Although Ecology maintains contract oversight, Idaho has been leading the effort to develop contract language and coordinate with Oregon and Washington.</p>	<p>Please provide EPA with a report on funding for the SFY 09 contract for MM5, AIRPACT, and Clearskies.</p>
<p>Ongoing Activities</p>		
<p>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.</p>	<p>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.</p>	<p>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.</p>
<p>2. Ecology will submit monitoring data to AQS within 90 days of the end of each calendar quarter.</p>	<p>Ecology is submitting the data within the required timelines.</p>	<p>Yes, Ecology has been timely in submitting data to AQS. We appreciate this timeliness.</p>
<p>3. EPA will review and approve an annual monitoring network review within 90 days of submission.</p>	<p>EPA has reviewed Washington’s 2008 network and final approval is pending. Data from the Washington network is submitted to EPA’s AQS and AIRNow.</p>	<p>EPA now has 120 days to respond</p>
<p>4. Ecology will maintain quality assurance program for ambient data as required by 40 CFR Part 58, Appendix A.</p>	<p>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.</p>	<p>Generally, Ecology runs a solid QA program for ambient data. We have one comment on audits – see below.</p>
<p>5. EPA will provide annual quality assurance audits as required by 40 CFR Part 58, Appendix A.</p>	<p>Ecology will check on the frequency of precision checks for gas analyzers and submit our QA reports to Chris Hall.</p>	<p>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</p>
<p>6. Ecology will, in collaboration with the LAAs, collect</p>	<p>This activity is ongoing.</p>	

data and prepare emission inventory and air monitoring databases to support air quality modeling.

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 Assurance (QA) reports.	This activity is ongoing.	We have not seen any QA reports from Ecology. If 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 does not do this activity and it appears to be out of date; the implementation of AirNOW negated this need. Ecology will also start again notifying EPA (Gina) of exceedances of ambient air standards within 24 hours.	We should revisit this item. 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.	