Clean Air

OBJECTIVE 1: Attain the National Ambient Air Quality Standards for ozone	
Environmental Indicators • Three year average of the number of days exceeding the 8-hour ozone standard • Three year average of the fourth highest 8-hour ozone concentration • Number of days exceeding the 1-hour ozone standard • The trend in vehicle miles traveled	
Strategies	**Performance Measures**
Light-Duty Inspection/Maintenance Program – Validate and improve the light-duty motor vehicle Inspection/Maintenance program. Work with DMV and the Program Manager to assure the success experienced in the start-up phase of the I/M program is continued.	• Assure the implementation of a registration denial system at DMV by: o Working with DMV and Agbar to develop needed software to assure implementation of registration denial system by 9/03. o Tracking the trend in number of registration denials. • Evaluate number of suspensions resulting from roadside checks by DMV to assure adequate enforcement of the sticker program. • Track inspection compliance rate. • Percentage of inspection compliance increase. • Work with DMV to enhance covert audit and suspension hearing procedures to assure covert audits result in appropriate enforcement action. • Review annual emission reduction trends from regulated vehicles to assure emission reductions meet target. • Issue report on I/M operating parameters by 7/31 each year. • Coordinate with DMV and the Program Manager to oversee the implementation of a subsidized technician training support program through 6/05. • Begin evaluating whether any changes are needed to the I/M program in 2007 by 9/04.
Heavy-duty Diesel Vehicles - Reduce emissions from on-road heavy-duty diesel vehicles.	• Work with the State Police, DMV and stakeholders to implement the heavy-duty diesel inspection program. • Phase I, on-road inspections, to begin by 7/03. • Phase II, periodic inspections, to begin by 11/04. • Continue work with the departments of Health and Education to develop a voluntary idling reduction program for school busses and other vehicles. • Develop a plan using EPA grant to implement an outreach for the fall of 2003.
Ultra-Low Sulfur Fuels – Support the early introduction of ultra-low sulphur diesel (USLD)	• Include outreach on USLD in anti-idling programs • Work with DOT to require USLD for state transportation projects. • Support using USLD in the state fleet. • Work with RIPTA to extend USLD to their ferry service. • Support use of USLD in Supplemental Environmental Projects when applicable.

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Air Quality/Transportation – Promote transportation policies that result in reduced emissions.	• Review submitted transportation projects within 30 days of receipt to assure the carbon monoxide impact from the project is below the air quality standard and/or that amount of ozone precursor emissions is acceptable. • Chair the Air Quality/Transportation Subcommittee to the State Planning Council. • Promote projects funded by CMAQ that reduce ozone precursor emissions.
Low Emissions Vehicle Programs – Support the introduction lower emission vehicles, cleaner fuels, advanced technonogy vehicles and lower emissions from other mobile sources.	• Work with the NESCAUM states to adopt the California LEV II program if there is a regional consensus to do so: o Decide whether to adopt by 12/03. o If yes, propose amended regulations by 6/04. o Finalize proposal by 9/04. • Work with the NESCAUM states to develop a region wide advanced technology vehicle program. If agreed, amend to Rhode Island Low Emission Vehicle Program to adopt the advanced technology vehicle provisions of the California LEV II program. o Agreement by 12/03. o If yes, propose amended regulations by 6/04. o Finalize proposal by 9/04. • Work with other agencies to develop alternative fuel, vehicle, and infrastructure programs including CMAQ funding of new CNG fill-stations and support of DOE alternatively fueled vehicle mandates. • Provide technical assistance to State Energy Office, RIPTA and Clean Cities Coalition in the development of infrastructure and AFV programs. • Support early introduction of ultra low sulfur diesel fuel. • Work with the Airport Corporation and Clean Cities Coalition to identify opportunities for emissions reductions at Rhode Island airports. • Support State Energy Office in finalization the Airport Road CNG station. • Research non-road mobile source categories for incentive programs to encourage the use of lower emissions technologies: o Propose source target source categories by12/03. o Increased use of low emissions technology non-road equipment. o Work with DOT to require retrofitted emission controls on diesel construction equipment used for State transportation projects.

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	• Assure continued air quality benefits of reformulated gasoline while eliminating the threat to groundwater contamination from MTBE. • Continue collaboration with NESCAUM and the Northeast Regional Task Force. • Support removal of oxygen mandate from reformulated gasoline. • If necessary submit waiver request, develop and promulgate regional fuel program with other northeast states if the mandate continues in effect.
Regulations – Keep ozone precursor regulatory programs up-to-date and relevant.	• Analyze the OTC model rule for additional NOx controls and propose any recommended revisions to APC Regulation No. 27 consistent with the model rule. • Decision made to postpone revising the regulation. This decision will be re-evaluated when new/revised NOx regulations have been promulgated by 3-4 OTC states. • Analyze the OTC model rules for mobile equipment repair and refinishing and solvent cleaning and propose any recommended amendments to APC Regulations Nos. 30 and 36 consistent with the model rule. o Analyze the model rule by 9/03. o Propose any recommended revisions by 12/03. o Finalize any proposal by 3/04. • Develop or amend regulations for regional programs for portable fuel containers, consumer products and architectural and industrial maintenance coatings consistent with the OTC model rules. o Propose a rule for portable fuel containers by 9/03. o Finalize the proposal by 12/03. o Propose amendments to consumer products and AIM coatings rules by 9/04. o Finalize the proposal for consumer product and AIM coatings by 12/04. • Amend VOC and HOC definitions in applicable regulations to reflect changes in federal definitions and toxicity and ozone depletion data. o Propose amendments by 12/03. o Finalize the proposal by ¾. • Review source specific emission limitations and amend if appropriate. • Amend, where appropriate, up to 15 RACT agreements by 6/04.

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Source Specific SIP Revisions - Make source specific emission limitations federally enforceable.	• Operate approved PAMs and ozone air monitoring networks and submit air quality, meteorological, and quality assurance data to AIRS. • Submission of the air quality, meteorological and quality assurance data to AIRS by the end of EPA required data submission period.
Ozone Monitoring - Monitor air quality for ozone and its precursors to learn more about ozone formation.	• Cooperate with regional efforts to use PAMs VOC, aldehyde, ozone and NOx data, as well as information from PAMs sites in other states. • Track emissions of precursors and formation of ozone. • Identify important sources of emissions. • Verify modeling results. • Follow development of 8-hour ozone implementation policy to assure the policy adequately addresses transport into the northeast.
Ozone Attainment Planning – Develop and/or update planning documents related to attanment and/or maintence of the 1-hour and 8-hour ozone standards.	• When adopted, develop a strategy to comply with the policy and follow requirements of the 8-hour ozone implementation policy. • Draft governor's letter on 8-hour attainment status to be submitted to EPA by 7/03. • Draft sent to Governor's office by 6/03. • Participate in any regional modeling and planning efforts. • Determine emission reductions needed to achieve attainment of the 8-hour ozone standard according to EPA timeline. • Participate in regional modeling.

OBJECTIVE 2: Reduce emissions of toxic air pollutants and ensure that no source of toxic air pollutants poses an unreasonable risk to public health.	
Environmental Indicators • Trends in emissions of chlorinated solvents • Trends in ambient concentration of benzene, 1,3 butadiene and formaldehyde	
STRATEGIES	**PERFORMANCE MEASURES**
Pollution Prevention - - Use pollution prevention techniques to reduce air toxics emissions.	• Emphasize pollution prevention in all permitting, compliance and inspection activities. • Recommend pollution prevention activities to facilities needing to comply with the air toxics regulation. • Allow additional time to implement pollution prevention measures. • Refer facilities to the Pollution Prevention Program in OTCA. • Number of referrals.
Mercury - Implement the Mercury Task Force voluntary and regulatory strategies to reduce exposure to mercury.	• Implement the Medical Waste Incinerator Regulation. • Ensure that RI Hospital incinerator is operated only as a pathological waste incinerator.

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	• Add mercury to APC Regulation No. 22 "Air Toxics" and prioritize mercury sources for air toxics operating permit review o Reproposal by 6/03. o Complete the prioritization by 9/03. o Finalize the proposal by 9/03.
Air Toxics Monitoring - Implement the Air Toxics Monitoring Pilot Project for the Providence, Rhode Island Metropolitan Area.	• Continue air toxics monitoring at the Urban League NATTS site Ongoing. • Aetholeometer installed by 8/03. • Chromium VI monitoring to begin by 8/03 and continue for at least one year. • Begin monitoring for acrolein when methods are available. • Set up air toxics monitoring site in Olneyville section of Woonasquatucket Watershed and operate for 1-year by 8/04. • Working with local groups and others, develop a communications strategy by 9/03. o Community presentations in fall of 2003. o Summarize Olneyville data by 11/04. o Community presentation in spring 2005. • Collect an estimated 6 short-term samples of toxic volatile organics, particulates, or other toxic species. Use to analyze the impacts from particular sources.
Air Toxic Sampling - Respond to concerns about toxic air contaminants.	• Obtain portable particulate monitors. Issue Purchase Order by 7/03. • Add federal Hazardous Air Pollutants (HAPs) and other relevant toxics to Regulation No. 22, "Air Toxics," that are not currently listed. o Reproposal by 6/03. o Finalize the proposal by 9/03.
Air Toxics Operating Permits - Assure emissions of air toxics from stationary sources do not pose an unacceptable risk.	• Prioritize sources of HAPS added to Regulation No. 22 for air toxics operating permit review– by 9/03. • Process outstanding air toxics operating permit applications, including conducting air quality modeling to determine whether sources comply with Acceptable Ambient Levels (AALs) in Regulation No. 22 and issuing provisional permits with compliance schedules to sources that do not. Issue 6 new permits or renewals per year. • Review multipathway risk assessments in preconstruction permit applications to evaluate indirect exposure to air emissions. o Each application for which a risk assessment is required. o Estimated 0 per year. • Inventory known significant stationary sources of Hazardous Air Pollutants and other potential sources. o Mail estimated 750 forms by 2/28 of each year. o Respond to estimated 300 technical assistance requests.

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	○ Send LNC's to non-responders by 7/31 each year. ○ Refer non-responders for enforcement action by 9/30 each year.
Inventory - Determine the quantity of toxic air pollutant emissions.	• Calculate emissions for estimated 700 smaller sources. • Review emissions calculations for estimated 50 larger sources. • Enter 750 records into PPTIS. • Use inventory data to track the success of state and federal toxics emission reduction programs. • Review inventory data to identify sources to which NESHAPS apply (estimated 6 per year) and to prioritize sources for state air toxic operating permit review. • Use inventory data to respond to citizens' concerns about health impacts of source specific emissions. • Submit 2002 air toxics emission inventory data for point, area and mobile sources to EPA in the National Emission Inventory format by 5/04.
NESHAPS - Reduce toxic air emissions by implementing the federal National Emission Standards for Hazardous Air Pollutants (NESHAPS).	• Determine by 60 days of promulgation whether sources covered by new NESHAPS exist in the State. If not, submit negative declaration to EPA. For NESHAPs applicable to Rhode Island sources, determine whether the State will take direct delegation or submit delegation request under section 112(l) of Clean Air Act Amendments of 1990 for substitution of a State rule. (estimated 6 per year). • Integrate NESHAPS requirements into existing State regulations and submit a 112(l) delegation request to EPA. ○ Propose any amendments within 6 months of promulgation. ○ Finalize proposal within 9 months of promulgation. ○ Submit 112(l) delegation request within 10 months of promulgation. • Modify the requirements for drycleaners in APC Regulation No. 22 and submit a 112(l) request to EPA to substitute the modified sections of APC Regulation No. 22 for the Federal drycleaners NESHAP. ○ Amended regulation proposed 9/02. ○ Finalize proposal by 7/03. ○ Submit 112(l) delegation request by 12/03.
Greenhouse Gases - Determine the need to reduce greenhouse gas emissions in Rhode Island	• Work with Office of Strategic Planning and Policy and Greenhouse Gas stakeholders group to develop the options contained in the Rhode Island Greenhouse Gas Action Plan. • Inventory greenhouse gas emissions-Review the GHG inventory developed by Tellus Institute and update the inventory.

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OBJECTIVE 3: Assure that the air quality in localities and neighborhoods promotes a high quality of life and the well being of residents.	
Environmental Indicators	
STRATEGIES	**PERFORMANCE MEASURES**
Accidental Releases - Minimize the potential for the accidental release of air contaminants by implementing the federal Accidental Release Program	• Finalize development and promulgate the Accidental Release Prevention Program Regulations. o Begin stakeholder process by 7/03. o Proposal by 12/03. o Finalize proposal by 3/04. • Contact sources subject to Rhode Island requirements that didn't have to submit Federal RMP and offer technical assistance by 3/31/04. • QA/QC RMP submitted to comply with Rhode Island requirements, (RI RMPS) by 9/04. • Conduct nonfiler initiative for RI RMP sources by 12/04. • Conduct paper review of RI RMPs by 3/05. • Request delegation of Accidental Release Prevention Program from EPA by 7/04. • Continue development and distribution of outreach and resource materials. • Distribute EPA informational materials to applicable sources quarterly. • Participate in all quarterly meetings meetings of the State Emergency Response Committee. • Conduct 12 audits compliance audits of facilities with of federal and state RMP survey by 6/05. • Update the accidental Release Program portion of the DEM website by 9/30 each year
Protect Neighborhood or Local Air Quality	• Support other DEM Offices by assessing the air quality in nuisance situations using information from monitoring, inventory and modeling. o Estimated 4 per year. • Inspect air pollution sources referred by other DEM Offices and determine compliance status. o Estimated 10 per year. o Number of sources found to be high priority violators. • Provide technical support for analyses, review and evaluation of water reuse by air pollution sources. o Estimated 1 per year. • Respond to requests to conduct open burning. • Inspect potential open burn sites and issue exemptions from the open burning prohibition provided criteria established in regulation are met. o Determine suitability for open burning. o Response within 10 working days. o Estimated 20 requests.

	• Review plans for alternative lead paint removal and for lead paint removal operations on structures other than buildings, (bridges, water tanks, etc).
	• Provide written approvals for plans that adequately contain the lead paint being removed and work with contractors with plans that are not approvable as submitted to address shortcomings in order to gain an approvable plan.
	  o All plans submitted within 30 days.
	  o Determine suitability of the proposed alternative removal operation and issue approvals.
	  o Estimated 30 approvals per year.
	• Serve as liaison to The Foundry for indoor air quality at 235 Promenade St.
	• Foundry to conform with DEM's lease with respect to air quality monitoring.
	• Coordinate biannual sampling with the Foundry and review result.
	• Participation in the watersheds group.
	• Attend meetings.
	• Provide OAR support.

OBJECTIVE 4: Maintain healthful air quality for carbon monoxide, nitrogen oxides, sulfur dioxide, lead and particulate matter and support other Key Objectives by continuing base programs.	
Environmental Indicators • Criteria pollutant levels compared to the NAAQS	
STRATEGIES	**ACTIVITIES**
Pollution Prevention - Use pollution prevention techniques to improve air quality.	• Emphasize pollution prevention in all permitting, compliance and inspection activities. • Recommend pollution prevention activities to facilities needing to comply with the air toxics regulation. • Allow additional time to implement pollution prevention measures. • Refer facilities to the Pollution Prevention Program in OTCA • Number of referrals.
Air Quality Monitoring - Monitor air quality and inform the public of unhealthful air quality.	• Operate and maintain the PM2.5 monitoring network. • Operate, maintain, repair and download data from 6 PM2.5 filter monitors at 4 sites. • Site, install and begin to operate an additional PM2.5 filter monitor in South Providence near I-95 by 1/04. • Calibrate monitors 1-2 times per week • Package and mail filters to contract laboratory for analysis 1-2 times per week. • QA/QC data received from contract laboratory. o Data capture.

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	• Operate, maintain and repair 3 continuous PM2.5 monitoring sites.
	  o Data capture.
	• Replace existing continuous monitors with updated equipment and install additional continuous monitor at Alton Jones site by 8/03.
	• Operate, maintain and repair PM2.5 speciation monitors at 2 sites.
	  o Change filters every 3 days.
	  o Package and mail filters to contract laboratory for analysis.
	• Direct the DOH Air Pollution Laboratory in the operation of an approved NAMS/SLAMS air monitoring network in conformance with 40 CFR 58.
	• Review monitoring network and report to EPA by 7/1 each year.
	• Direct changes to the network from annual review or for other reasons.
	  o Minimum 75% data capture.
	• Submit air quality, precision, and accuracy data to AIRS within 90 days from the end of each quarter.

	• During the ozone season, electronically send EPA ozone measurements and a prediction of the next day's ozone levels for use in ozone mapping.
	  o Send data 15 times daily.
	• Forecast the next day's ozone daily.
	  o Percent of data sent.

	• Work with RIPTA to prepare for the Ozone Alert Days program. • Develop a joint communications plan by 4/30 each year.
	• Daily make a prediction of air quality for the next day. Inform the media of the daily prediction and issue alerts when unhealthful air quality is predicted. • Start PM fine forecasts by 10/03.
	• Reevaluate DEM's Daily Ozone Forecast web site to ensure that it supplies applicable data in a user-friendly format– by 4/30 of each year.
	• Work with television stations to use the ozone map during local weather forecasts. • Number of stations using the ozone map.
	• Report the daily PM2.5 concentration from continuous monitors.
	• Publish and distribute the Annual Air Quality Data Summary. • 2002 edition by 6/03. • 2003 edition by 6/04. • 2004 edition by 6/05.

Stationary Source Compliance Assure stationary sources comply with the applicable regulations.	• Insect 70% of air pollution sources required to obtain a Title V Operating Permit -35 Inspections. • Number of sources found to be high priority violators. • Review annual Compliance Certifications and semi annual monitoring reports for each Title V permit issued. • Inspect 25% of the air pollution sources with enforceable emissions caps (26 Inspections). • Number of sources found to be high priority violators. • Review quarterly reports of continuous emission monitoring data submitted by 5 applicable sources. • Number of non-compliant periods. • Inspect 70% of gasoline dispensing facilities equipped with Stage II vapory recovery systems (350 Inspections). • Percent in substantial compliance. • Observe Stage II compliance tests. o 75 tests per year. o Percent passing. • Issue informal enforcement actions to sources that have minor noncompliance with air pollution control regulations • Number of informal enforcement actions. • Recommend formal enforcement actions be initiated against noncompliant sources, where appropriate, and assist in the resolution of those actions. • Number of recommendations. • Participate in multimedia inspections with other DEM Offices. o Estimated 2 inspections per year. • Determine compliance status with Air Pollution Control Regulations. • Enter inspections and findings in AFS database for applicable sources within 15 days of determinations/verifications. • Inspect 50% of drycleaning facilities to insure compliance with revised regulations within six months after revised requirements apply if resources allow. • Quarterly report the number of inspections, informal enforcement actions, resolution of informal actions and referrals to the Office of Compliance and Inspection. • Work with the Office of Technical and Customer Assistance to implement the Environmental Results Program for specific source categories on schedule determined with OTCA.
Stack Testing – Assure the accuracy of emission tests and emission monitors	• Oversee stack testing of emission sources. o Estimated 40 units tested. • Observe quarterly audits and annual relative accuracy test audits of CEMs. o 27 audits and tests. • Review, and when appropriate approve, all protocols for stack testing and CEM audits submitted within 45 days of receipt. o Estimated 30 reviews.

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	• Review all final reports submitted for stack tests and audits and prepare a report on the testing results within 45 days of receipt.
	  o Estimated 67 reports.
	• Initiate enforcement process for failures within 30 days of review.
	• For newly affected Acid Rain units, review monitoring plans, observe certification tests, review certification application test reports, and recommend approval/disapproval.
	  o Estimated 1 unit per year.
	• Enter stack testing and audit findings in the AFS database within 30 days of receiving final reports.
	  o Estimated 67 tests and audits.

Operating Permits Program
Improve the regulated community's ability to comply with air pollution control regulations, DEM's ability to enforce regulations and provide an opportunity for public input to the permit review process by implementing the Operating Permits program.
	• Complete the review/issuance process for each emissions cap application received– within six months of receipt of the application
	  o Estimated 2-3 applications per year.
	• Issue emission cap renewals for each facility whose emission cap expires– prior to emission cap expiring.
	  o 0 in FY 2004.
	  o 3 in FY 200
	• Conduct a completeness review of any new applications received– within 60 days of receipt of an application.
	  o Estimated 1-2 reviews per year.
	• Prepare draft operating permits and complete the review/issuance process for all operating permit applications by 6/04.
	  o 44 operating permits issued by 12/03.
	  o 49 operating permits issued by 6/04.
	• Ensure that the Operating Permit program budget is sustained by adequate emission fee collections.
	• Prepare draft operating permits and complete the review/issuance process for all operating permit renewal applications.
	  o 2 in FY 04.
	  o 6 in FY 05.
	• Complete the review/issuance process for each request to modify an operating permit within 60 days for an administrative permit amendment.
	  o Estimated 10 per year.
	  o Within 90 days for a minor modification.
	  o Estimated 10 per year.
	  o Within 180 days for a significant modification.
	  o Estimated 5 per year.
	• Review new NSPS and notify EPA of the State's delegation intentions– within 60 days of notification of the new standard.
	• Develop a report on the status of permit processing and submit to the Assistant Director within 5 days of the end of each month.

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	• Update the listing of Operating Permits issued on the DEM website– within 5 days of the end of each month. • Support the Operating Permits Advisory Commission. • Ongoing and up to 4 meetings per year.

Preconstruction Permitting – Assure new sources of air pollutant emissions do not cause unhealthful air quality and conduct timely review of permit applications.	• Complete the review/issuance process for minor source permit application within four to six months of receipt of an application.
	• Estimated 30 applications per year.
	• Complete the review/issuance process for major source permit application– within twelve months of receipt of an application.
	• Estimated 1 application per year.
	• Implement the recommendations in the Final Air Pre-Construction Permit Streamlining Task Force Report.
	• Post revised air toxics modeling guidance on the department website when the document is finalized.
	• Propose general permits or permits by rule for small degreasers, drycleaners, emergency generators by 6/03.
	  o Finalize by 12/03.
	• Develop a program for comprehensive permit application submittals. Pilot program by 7/02.
	  o Propose full implementation by 7/03.
	  o Finalize by 12/03.
	• Convene a workgroup by 12/03 to evaluate:
	  o "First come/first served" policy for processing applications.
	  o Tiered application requirements.
	  o Changes to permit thresholds.
	• Convene a workgroup by 12/31/04 to consider:
	  o Submission of applications electronically.
	  o Facility wide BACT determinations.
	  o BACT/Modeling of equipment replacements.

	• Develop a report on the status of permit processing and submit to the Assistant Director within 5 days of the end of each month.
	• Update the listing of Preconstruction Permits issued on DEM website– within 5 days of the end of each month.
	• Begin to evaluate changes needed to Regulation No. 9 to implement the 12/02 revisions to the federal New Source Review program– during FY 05.
	  o Propose amendments by 12/05.
	  o Finalize proposal by 3/06.

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Inventory - Determine the quantity of air pollutant emissions.	• Review current information sources to determine if new facilities need to be added to database by2/15 of each year.
	• Inventory known significant stationary sources of Hazardous Air Pollutants and criteria pollutants.
	• Mail estimated 750 forms by 2/28 of each year.
	• Respond to estimated 300 technical assistance requests.
	• Send LNC's to non-responders by 7/31 each year.
	• Refer non-responders for enforcement action by 10/1 each year.
	• Calculate emissions for estimated 700 smaller sources.
	• Review emissions calculations for estimated 50 larger sources.
	• Enter 750 records into PPTIS.
	• Submit the 2002 base year inventory for ozone and fine particulate matter for point, area and mobile sources to EPA in the National Emission Inventory format by 6/04.
	• Update APC Regulation No. 14 to clarify inventory reporting requirements.
	  o Amendments proposed 9/02.
	  o Finalize proposal by 7/03.
	• Enter Toxic Release Inventory data to spreadsheet. Compare state data to EPA data and reconcile any differences– by 12/31 of each year for previous reporting year.
	• Use the inventory for calculating emission fees, determining compliance with permit restrictions and regulatory requirements, identifying air toxics sources, identifying sources covered by new requirements, identifying sources in particular neighborhoods in response to inquiries or observation of elevated ambient levels, and tracking emissions reductions.
	• Operating permit sources inventory complete by 7/15 each year.

Fine Particulate Matter	• Submit a Governor's recommendation on the Rhode Island's attainment status for PM2.5 by 2/04.
Training – Provide opportunities to enhance professional development	• Continue development and delivery of technical and non-technical training to all staff. • Estimated 10 training opportunities per year.
Regional Haze	• Define Rhode Island's contribution to regional haze and plan the necessary actions. • Participate in the northeast regional haze planning process. • Identify BART sources in Rhode Island by 6/03.