

**Rhode Island Department of Environmental Management  
Office of Air Resources  
FY 2000 Performance Partnership Agreement  
Air Resources Workplan**

**I. Introduction:**

The Air Resources Workplan is part of the FY 2000 Performance Partnership Agreement between the Rhode Island Department of Environmental Management and the New England Region of the U.S. Environmental Protection Agency (EPA). The Office of Air Resources (OAR), along with its partner the Air Pollution Laboratory at the Department of Health, are responsible for protecting public health by administering Rhode Island's air quality program under the State's Clean Air Act and as delegated by the federal Clean Air Act. The purpose of this workplan is to direct the work of the Office to achieving the Key Objectives identified in the workplan and to support the Department's Strategic Priorities.

Rhode Island's air quality meets the National Ambient Air Quality Standards (NAAQS) for five of the six criteria pollutants. Carbon monoxide, sulfur dioxide, nitrogen oxides, lead, and particulate matter less than 10 microns in diameter (PM10) have been controlled so that ambient levels are well below national standards. High ozone concentrations still threaten the health of Rhode Islanders despite vigorous efforts to reduce emissions of the volatile organic compounds and nitrogen oxides that lead to ozone formation. The long term trend for ozone air quality has been improving, but the 8-hour ozone NAAQS<sup>1</sup> is regularly exceeded in Rhode Island.

High ozone concentrations in Rhode Island result from in-state emissions and from the transport of ozone and ozone precursors from upwind areas. The OAR has implemented 17 programs aimed at reducing VOC and NOx emissions since the enactment of the 1990 Amendments of the Clean Air Act. The programs include: reformulated gasoline, vapor recovery at gasoline pumps, the application of reasonably available control technology at VOC and NOx emission sources and the National Low Emission Vehicle program. The only program remaining to be implemented is the Motor Vehicle Inspection/Maintenance Program. The Department of Administration's Division of Motor Vehicles will begin the I/M program during FY 2000.

Good ozone air quality cannot happen in Rhode Island unless the transport of ozone and ozone precursors from upwind areas is significantly reduced. Rhode Island is a member of the Ozone Transport Commission whose purpose is to assess ozone transport and

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<sup>1</sup> The U.S. Court of Appeals for the DC Circuit found the 8-hour ozone NAAQS to be unenforceable on May 14, 1999. EPA has appealed that order.

strategies for mitigating transport. Strategies developed by the OTC have been successful in reducing VOC and NOx emissions from within the OTC. Rhode Island has petitioned EPA under the authority of the Clean Air Act for emission reductions from upwind areas outside the OTC. We have also supported federal efforts to reduce those emissions.

As more information became available on the dangers of airborne fine particulate matter, EPA revised the particulate matter NAAQS to include a standard for fine particulate<sup>2</sup>. The OAR developed a fine particulate matter monitoring network during FY 1999. We will add two sites to the network in the coming year. We will be able to determine if Rhode Island meets the revised air quality standard after two more years of data are collected.

The Air Toxics program has been in place since 1988. The program regulates the fence line impact of emissions of 40 toxic air contaminants. The emission sources presenting the highest risk were required to obtain Air Toxics Operating Permits before moving on to less risky emission sources. The challenge for the Air Toxics program is to incorporate pollutants now covered by the federal Hazardous Air Pollutant program into Rhode Island's programs.

The Office of Air Resources and its predecessor agencies has made a great deal of progress since air pollution control began in 1967. Then smoking stacks were the main interest, now VOC, NOx, fine particulate and air toxics are the pollutants that most threaten Rhode Islanders. The Office has a staff of 31 and supports a staff of 6 in the Air Pollution Laboratory. The Office's general program areas are compliance assurance, permitting, emissions inventory, air quality monitoring, attainment planning, mobile sources, and air toxics.

## II. Mission Statement

*The mission of the Office of Air Resources is to preserve, protect and enhance the air resources of Rhode Island.*

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<sup>2</sup> The U.S. Court of Appeals for the DC Circuit remanded the fine particulate matter NAAQS back to EPA on May 14, 1999. EPA has appealed that order.

### III. Office Highlights

Following are examples of initiatives to be undertaken by the Office of Air Resources that support one or more of the Department's Strategic Priorities for FY 2000.

- **Medical Waste Incinerator Regulations:** OAR will promulgate updated regulations to apply to medical waste incinerators. These regulations are a Clean Air Act requirement and are consistent with the Mercury Action Plan adopted by the Conference of New England Governors and Eastern Canadian Premiers. The regulation includes emission standards but stresses source separation and product substitution as means to prevent mercury and other toxics from entering the waste stream.
- ◆ **Accidental Release Program:** OAR will implement the Accidental Release Program this fiscal year. The Accidental Release Program is a Clean Air Act requirement that assures large users of toxic materials have planned for the prevention of and response to accidental releases. The program is expected to result in less use and storage of hazardous materials and improved storage and handling of the remaining materials. An advisory board has been established and we are working with the State Emergency Response Council and Local Emergency Planning Councils. We are also partnering with the Office of Technical and Customer Assistance and the University of Rhode Island's Center for Pollution Prevention to provide initial audits of some facilities.
- ◆ **Alternative Fuels Strategy:** OAR has traditionally supported activities that favor the introduction of alternative fuel vehicles and infrastructure in the State and region. OAR has a seat on the Steering Committee for the Ocean State Clean Cities Program, a Department of Energy initiative to expand the use of alternatively fueled vehicles. We have also supported the use of Congestion Mitigation and Air Quality for projects that introduce alternative fueled vehicles in the State government fleet. In the coming year we will develop a comprehensive strategy for promoting alternative fueled vehicles and the supporting infrastructure in the motor vehicle fleet and potentially in other applications.
- ◆ **Equity, Air Toxics and Risk Communication in Providence Project:** OAR is a partner in a grant application to EPA to identify urban air toxics hot spots and use community resources to rectify the problem and inform the community of the dangers of toxics in air. We are partnering with the Northeast States for Coordinated Air Use Management (NESCAUM), the Department of Health, and The Providence Plan. If funded this project would provide the opportunity to partner with community groups who have had a disproportionate impact to air toxics. This project would concentrate on urban areas including the Olneyville area of the Woonasquatucket River Watershed.
- ◆ **Renew the List of Toxic Air Pollutants:** OAR has been successful in reducing the risk to public health from the 40 air toxics listed in the Air Toxics regulation. This fiscal year we will invigorate the program by adding a number of substances listed by

EPA as Hazardous Air Pollutants that are applicable to Rhode Island. We will also review and if necessary amend the Acceptable Ambient Limits for the existing 40 substances.

- ◆ **Air Monitoring in Neighborhoods:** OAR will monitor air quality for specific substances of interest in situations where air quality in specific neighborhoods may threaten public health. OAR, along with the Department of Health, will interpret the monitoring results for use by other DEM Offices and the public.
- ◆ **Review of Violations Study:** OAR spends a large amount of resources inspecting regulated sources of air pollutant emissions. In order to determine if we are using those resources wisely, we will examine how we discovered instances of noncompliance found in the past few years. The results of the study could affirm that inspections are productive in uncovering violations of regulations or that we need to reassess how those resources are used.
- ◆ **Operating Permits Reform:** Drafting of operating permits uses much more resources than program planners anticipated. That, and other factors, has resulted in longer processing time and the inability to meet our timeline to issue all initial operating permits. OAR will determine if reforms such as allowing applicants to provide drafts of their own operating permits will be useful in reducing permit processing time.

OAR has been collecting emission fees to run the operating permits program since 1994. The number of facilities subject to the program has been significantly reduced since then. Emissions have also decreased. During FY 2000 we will review the emission fee program and recommend any changes that may be necessary.

#### **IV. Key Objectives and Strategies**

The following Key Objectives have been identified as necessary for the Office of Air Resources to achieve its mission of preserving, protecting and enhancing the air resources of the State.

Attain the National Ambient Air Quality Standards for ozone.

- ◆ Reduce emissions of toxic air pollutants and ensure that no source of toxic air pollutants poses an unreasonable risk to public health.

- ◆ Assure that the air quality in localities and neighborhoods promotes the comfort and convenience of the residents.
- ◆ Maintain healthful air quality for carbon monoxide, nitrogen oxides, sulfur dioxide, lead, and PM10 and support other Key Objectives by continuing base program strategies.

<b>OBJECTIVE 1:</b> Attain the National Ambient Air Quality Standards for ozone.	<b>Environmental Indicators*</b> -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	
<b>STRATEGIES*</b>	<b>ACTIVITIES</b>	<b>Performance Measures</b>
<b>Mobile Sources</b>		
Assure an effective motor vehicle Inspection/Maintenance (I/M) Program.	<ul style="list-style-type: none"> <li>◆ - Monitor DMV's implementation of the program.</li> <li>◆ Participate in the I/M Advisory Panel.</li> <li>◆ Fill the Air Quality Specialist position to act as liaison to DMV and the I/M contractor.</li> <li>◆ Provide internal training the person in the liaison position.</li> <li>◆ Amend DEM regulations for the environmental aspects of the I/M program and assist DMV in amending regulations for the operational aspects of the I/M program.</li> </ul>	<ul style="list-style-type: none"> <li>Percent of failures</li> <li>-Percent of failures successfully repaired</li> <li>-Increased awareness of motor vehicle emissions</li> <li>-Use an effective emissions test and proper pass/fail criteria</li> <li>-Reduced emissions from the existing fleet</li> <li>-Amend DEM and DMV regulations by 31 December 1999</li> <li>-Submit the amended regulations to EPA by 15 January 2000</li> </ul>

<p>- Review and comment on transportation project specific air quality analyses.</p>		<p>Each project within 30 days to protect carbon monoxide air quality and maintain consistency conformity analysis of the Transportation Improvement Program</p>
<p>Chair the Air Quality/Transportation Subcommittee to the State Planning Council</p>	<p>.</p>	<p>-Promote projects funded by CMAQ that reduce ozone precursor emissions</p>
<p>Develop an Alternative Fuels Strategy. Support the introduction of alternative fueled vehicles in the State fleet as well as in municipal and private fleets.</p>	<ul style="list-style-type: none"> <li>◆ - Cooperate with the State Energy Office and participating communities in the Ocean State Clean Cities program.</li> <li>◆ Collaborate regionally in the development of emission reduction opportunities for airports.</li> <li>◆ Work with the Airport Corporation to inventory emissions and identify targets for emissions reductions.</li> <li>◆ Purchase a dedicated CNG vehicle to replace one that was destroyed in an accident.</li> </ul>	<p>Make progress toward the introduction of cleaner alternative fuels and the necessary infrastructure - Develop an Alternative Fuels Strategy by 30 June 2000</p>
<p>Collaborate with other northeast states in the implementation of a heavy-duty diesel inspection/maintenance program.</p>		<p>Assure Consistency among northeast states to ease implementation -Information sharing</p>
<p>LAST SAVED 10/26/99</p>	<p>Develop legislation and regulations for an on-road heavy duty diesel testing program.</p> <p>6</p>	<p>Legislation by 30 November 1999 Regulations by 30 June 2000</p>

	Participate in the NESCAUM Mobile Source Committee and Heavy Duty Diesel Workgroup, the OTC Mobile Source Committee and the STAPPA Mobile Source and Fuels Committee.	-Consistency among states -Information sharing
<b>Regulations</b>		
	Promulgate regulations to implement any new Control Technique Guidelines that are issued.	-Within 12 months of issuance -Reduced ozone precursor emissions for a particular source category -Submit negative declarations for aerospace and shipbuilding CTG's
	Submit a SIP revision in response to the NOx SIP call.	-By 30 September 1999 -Support federal efforts to reduce ozone precursor emissions in the northeast airshed
	Modify inspection requirements for bulk terminals in APC Regulation No. 11 "Petroleum Liquids Marketing and Storage".	-By 31 March 2000 -Simplify requirements and improve compliance
	Modify Stage II vapor recovery requirements for gasoline dispensing facilities in APC Regulation No. 11.	-By 31 March 2000 -Eliminate ambiguities and increase enforceability
	-Review restrictions on the application of cutback asphalt in APC Regulation No. 25 "Control of Volatile Organic Compound Emissions from Cutback and Emulsified Asphalt" and make any necessary modifications. -	-By 31 March 2000 -Simplify requirements and improve compliance

<b>Source Specific SIP Revisions</b>		
	Complete all source specific SIP revisions required for non-CTG RACT sources, for CTG sources seeking alternative RACT determinations, and for miscellaneous NOx RACT sources.	-Clariant by 31 December 1999 -Facile Holdings by 31 January 2000 -Old Bradford Soapworks by 29 February 2000 -Block Island Power by 31 March 2000
<b>Ozone Monitoring</b>		
	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 the next calendar quarter
	Determine training needs for the PAMs program and insure staff receives such training.	
	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
<b>Regional Cooperation</b>		
	Participate in the Ozone Transport Commission and it's various committees and workgroups and other regional partners to reduce ozone precursor emissions in the northeast airshed.	-Secure a commitment of enforceable mandate to reduce emissions of nitrogen oxides by 955,000 per year by 2003 in 22 northeast states
	Participate in the NESCAUM Attainment Planning Committee.	-Promote consistency in ozone attainment strategies among northeast states

	Participate in any regional modeling and planning efforts.	-Determine emission reductions needed to achieve attainment
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<b>OBJECTIVE 2:</b> Reduce emissions of toxic air pollutants and ensure that no source of toxic air pollutants poses an unreasonable risk to public health.	<b>Environmental Indicators</b> -Trends in emissions of chlorinated solvents. -Trends in ambient concentration of benzene, 1,3 butadiene and formaldehyde	
<b>STRATEGIES</b>	<b>ACTIVITIES</b>	<b>PERFORMANCE MEASURES</b>
	Participate in the “Equity, Air Toxics and Risk Communications in Providence” project when funded.	-Obtain grant funding by 4/30/00 -Establish teams to identify hot spots by 6/30/00 -Design outreach program by 12/31/00
	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 -Attend a pollution prevention workshop given by OTCA
Implement Mercury Task Force voluntary and regulatory strategies to reduce exposure to mercury	-Promulgate the Medical Waste Incinerator Regulation -Voluntary Mercury Challenge	-Medical Waste Incinerator regulations for public comment by 12/31/00 promulgated by 1/31/01 -Four medical waste incinerators in compliance 6 months after promulgation -RI aiming for mercury-free emissions by 2003, EPA goal is 50% by 2003 -These regulations also reduce PVC’s in the waste stream by 50% by 2003

	Determine whether to apply for delegation of MACT standards for degreasers, drycleaners and/or chrome platers.	-By 29 February 2000
	Conduct an evaluation of MTBE in the environment	-Ongoing with Water Resources and Waste Management
	Develop more effective methods of preventing releases of lead	-Work with the Department of Health along with Compliance and Inspection and Waste Management
<b>Air Toxics Monitoring</b>	- Monitor for toxics, including aldehydes, at PAMs sites.	-Ongoing - Spatial or temporal trends in toxics concentrations
	Collect short-term samples of toxic volatile organics, particulates, or other toxic species.	-As needed and in response to neighborhood complaints -Use to analyze the impacts from particular sources
<b>Air Toxics Operating Permits</b>	Add federal Hazardous Air Pollutants (HAPs) to Regulation No. 22, "Air Toxics," that are not currently listed.	-By 6/30/00
	Require sources to apply for air toxics operating permits in hazard factor priority order. Process air toxics operating permits, including conducting air quality modeling to determine whether sources comply with the Acceptable Ambient Levels (AALs) in Regulation No. 22 and issuing provisional permits with compliance schedules to sources that do not.	Require 7 new applications  Issue 18 new permits or renewals

	Develop new health based standards and guideline values and revise the APC Regulation No. 22 “Air Toxics” Acceptable Ambient Levels.	By 6/30/00
	Review multipathway risk assessments in preconstruction permit applications to evaluate indirect exposure to air emissions.	-Each application for which a risk assessment is required
<b>Inventory</b>	Inventory known significant stationary sources of Hazardous Air Pollutants and other potential sources.	-Annually
	Review inventory data to identify sources to which NESHAPS apply and to prioritize sources for state air toxic operating permit review.	-Upon proposal of a NESHAP and annually for state program prioritization
	- Use inventory data to respond to citizens' concerns about health impacts of source specific emissions.	-When requested
	Use inventory data to track the success of state and federal toxics emission reduction programs.	-Track trends in air toxics emissions
	Review inventory forms to determine which additional data elements should be added to be consistent with Federal Hazardous Air Pollutant guidelines.	-Prior to mailing forms for Reporting Year 1999

<b>NESHAPS</b>	Determine whether sources covered by new NESHAPS exist in the State. If not, notify EPA with a negative declaration. For NESHAPS applicable to Rhode Island sources, determine whether the State will take direct delegation or will submit a request under section 112(l) of the Clean Air Act Amendments of 1990 (112(l) request) for substitution of a State rule.	-Upon promulgation of each new NESHAP
	Integrate NESHAPS requirements into existing State regulations and submit a 112(l) request to EPA.	-Where appropriate to simplify regulatory requirements
	Submit a 112(l) request to EPA to substitute APC Regulation No. 36 "Control of Emissions From Organic Solvent Cleaning" for the Federal degreasing NESHAP.	-By 3/31/00
	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.	By 6/30/00
<b>Greenhouse Gases</b>	Complete the statewide inventory of greenhouse gas emissions.	By 12/31/99
	Evaluate inventory and develop a greenhouse strategy.	By 6/30/00

<b>OBJECTIVE 3: Assure that the air quality in localities and neighborhoods promotes the comfort and convenience of the residents.</b>	Environmental Indicators	
<b>STRATEGIES</b>	<b>ACTIVITIES</b>	<b>Performance Measures*</b>
<b>Accidental Releases</b>	Finalize development and promulgate the Accidental Release Prevention Program Regulations.	-By 3/31/00
	Request delegation of the Accidental Release Prevention Program from EPA.	By 5/30/00
	Evaluate the Federal Risk Management Plan (RMP) database and determine what modifications are necessary for the Rhode Island program.	-By 6/30/00
	Continue development and distribution of outreach and resource materials.	
	Conduct a Risk Management and Risk Reduction Seminar for smaller businesses regulated under the General Duty Clause.	-By 12/31/99
	Establish a Web page within the DEM web site.	-By 11/30/99
	Participate in meetings of the State Emergency Response Committee.	-Attendance at meetings
	Conduct a completeness and accuracy check of Risk Management Plans submitted to EPA.	-All plans submitted
	Conduct compliance audits of facilities with Risk Management Plans	-Upon delegation -Conduct 4 audits
	Submit a list of facilities needing Risk Management Plans to EPA	By 12/31/99

<b>Miscellaneous</b>	Support other DEM Offices by assessing the air quality in nuisance situations using information from monitoring, inventory and modeling.	Each time requested
	Inspect air pollution sources referred by other DEM Offices.	-Each request -Determine compliance status
	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.	-Each request -Determine suitability for open burning
	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.	-All plans submitted within 30 days Determine suitability of the proposed alternative removal operation and issue approvals -Number of approvals
	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

<b>OBJECTIVE 4: Maintain healthful air quality for carbon monoxide, nitrogen oxides, sulfur dioxide, lead and PM10 and support other Key Objectives by continuing base programs.</b>	<b>Environmental Indicators</b>	
<b>STRATEGIES</b>	<b>ACTIVITIES</b>	<b>Performance Measures*</b>

	Work with OTCA to develop and give a pollution prevention awareness workshop for Air Resources staff.	-Training by 11/30/99 -Increased P2 referrals
<b>Air Quality Monitoring</b>	Operate and maintain the PM2.5 monitoring network	-Ongoing -Data capture
	Begin PM2.5 monitoring at 2 additional sites.	-By 1/1/00
	-Begin continuous PM2.5 monitoring at one site and speciated PM2.5 monitoring at one site.	One by 1/1/00 -One when the RIPTA terminal in Providence is built
	Direct the DOH Air Pollution Laboratory in the operation of an approved NAMS/SLAMS air monitoring network in conformance with 40 CFR 58.	-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 program.	-Percent of data sent
	Work with television stations to use the ozone map during local weather forecasts.	Number of uses of the ozone map
	Publish and distribute the Annual Air Quality Data Summary.	By 6/30/00

<b>Stationary Source Compliance</b>	Inspect all air pollution sources required to obtain a Title V Operating Permit. -Review annual Compliance Certifications for sources with a Title V permit.	-57 Inspections -Percent in compliance
	Inspect 50% of the air pollution sources with enforceable emissions caps.	-51 Inspections -Percent in compliance
	Review formal and informal enforcement actions for the past two years, determine if the violations were discovered by source inspections or other means, adjust inspection resources, evaluate the use of inspection resources.	-By 12/31/99
	Inspect minor air pollution sources.	-50 Inspections -Percent in compliance
	Review quarterly reports of continuous emission monitoring data submitted by applicable sources.	-All submittals from 4 sources -Number of non-compliant periods
	Inspect all gasoline dispensing facilities equipped with Stage II vapory recovery systems.	-Up to 500 Inspections -Percent in compliance
	Observe Stage II compliance tests.	-50% of the tests -Percent passing
	Issue informal enforcement actions to sources that have minor noncompliance with air pollution control regulations.	-All minor violations -Number of informal enforcement actions
	Recommend formal enforcement actions be initiated against noncompliant sources, where appropriate, and assist in the resolution of those actions.	-All violations -Number of recommendations

	Participate in NESCAUM Enforcement Committee meetings. -Information sharing	-All meetings
	- Participate in multimedia inspections with other DEM Offices. -Determine compliance status with Air Pollution Control Regulations	-All appropriate inspections
	Enter inspections and findings in AFS database.	All inspections entered
<b>Stack Testing</b>		
	Oversee stack testing of emission sources.	-All tests Minimum of 31 tests -Number of tests
	Observe quarterly audits and annual relative accuracy test audits of CEMs.	-Minimum of 13 All audits and accuracy tests -Number of audits and tests
	Review, and when appropriate approve, all protocols for stack testing and CEM audits. Review within 45 days of receipt	Number of reviews
	Review all final reports submitted for stack tests and audits.	-Within 45 days of receipt -Initiate enforcement process for failures
	For newly affected Acid Rain units, review monitoring plans, observe certification tests, review certification application test reports, and recommend approval/disapproval.	-All units Number of new units
	Enter stack testing and audit findings in AFS database.	All tests and audits
<b>Operating Permits Program</b>		

Complete the review/issuance process for each emissions cap application received.	Complete the review/issuance process for each emissions cap application received.-Within six months of receipt of the application	-Within six months of receipt of the application number of applications
	Conduct a completeness review of any new applications received. Within 60 days of receipt of an application	Within 60 days of receipt of an application Number of reviews
	Prepare draft operating permits.	-16 draft operating permits
	Ensure that the Operating Permit program budget is sustained by adequate permit fee collections.	-Collections meet or exceed program expenses
	Review the Emission Fee program and recommend any revisions.	-By 12/31/99
	Review new NSPS and notify EPA of the State's delegation intentions.	Within 60 days of notification of the new standard
	Participate in NESCAUM Stationary Source Committee.	Up to 2 per year -Consistency among northeast states in permit decisions and requirements
	Support the Operating Permits Advisory Commission.	-Ongoing and up to 4 meetings per year
	Investigate allowing applicants to provide draft operating permits.	-Recommendation by 1/31/00
	Update APC Regulations Nos. 28 and 29 in response to changes in federal rules.	-Within the timeframe prescribed in the federal rules
<b>Preconstruction Permitting</b>		
	Complete the review/issuance process for minor source permit application.	-Within four to six months of receipt of an application -Number of permits issued -Number of applications in review -Average waiting time

	Complete the review/issuance process for major source permit application.	-Within twelve months of receipt of an application -Number of permits issued -Average waiting time
	Develop and propose a new system to prioritize the review of permit applications.	-By 3/31/00
<b>Inventory</b>		
	Inventory known significant stationary sources of Hazardous Air Pollutants and criteria pollutants.	Inventories mailed by 3/31/00 -Number of inventories mailed -Percent received
	Calculate emissions for smaller sources and review calculations of larger sources for accuracy.	-Number of sources
	Enter emissions data in the Division's Focus database and, for larger sources, in the EPA AFS data base.	-All sources
	- 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.	-Ongoing
<b>Regional Cooperation</b>	Chair the NESCAUM Board of Directors and participate in various Committees and Workgroups.	-Ongoing Consistency among northeast states -Information sharing
<b>Training</b>	Continue development and delivery of technical and non-technical training to	Ongoing

	all staff.	
	Participate in NESCAUM Training Committee.	All meetings