

Regional Air Pollution Control Agency (RAPCA) FFY 2010 End of Year Report

Administrative Requirements	RAPCA's Progress (Includes dates completed where appropriate)
RAPCA will participate in negotiations with U.S. EPA and the Ohio EPA to submit a final grant application/contract. RAPCA will make FFY 2009 and 2010 amendment requests as necessary.	The grant meeting was held with Ohio EPA, USEPA, and the Cincinnati Local Agency in June of 2010. RAPCA sent five people to this meeting and participated in all the sessions. We take these negotiations very seriously and do all we can to contribute to their success. All grant amendments were submitted as requested.
RAPCA will submit a comprehensive end-of-the year progress report for FFY 2010 by November 1, 2010.	This report will fulfill this requirement.
RAPCA will submit a final FFY 2009 Financial Status Report (FSR) or extension request by December 31, 2009 and certify that CEL is met.	The final Financial Status Report (FSR) was submitted on December 21, 2009.
RAPCA will implement MBE, WBE, and EEO.	Ongoing through our Purchasing Department.
RAPCA will submit the final FFY 2010 Financial Status Report or an extension request by December 31, 2010.	We are working with our accountants to ensure this deadline is met by December 31, 2010.
RAPCA will submit a FY2011 Section 105 Application by August 1, 2010 (assuming national program guidance is available from U.S. EPA). RAPCA will continue to work with U.S. EPA and Ohio EPA to develop a workplan that includes U.S. EPA's goals as well as outputs and outcomes.	The FFY 2011 Section 105 Application was submitted on July 20, 2010. RAPCA adopted the workplan template as suggested by U.S. EPA for our FFY 2010 Application and has continued this approved template with our FFY 2011 application.
RAPCA will not supplant any non-Federal funds that would otherwise be available for maintaining the ongoing Section 105 supported program.	RAPCA does not supplant non-Federal funds with Section 105 funds.

Essential Air Pollution Control Program Elements and Progress

Goal: 1 - Clean Air & Global Climate Change¹		
Objective 1.1 - Healthier Outdoor Air - Through 2014, working with partners, protect human health and the environment by attaining and maintaining health-based air-quality standards and reducing the risk from toxic air pollutants.		
Sub-Objective: 1.1.1 - Reduce Criteria Pollutants and Regional Haze		
Outcomes		
By 2015, reduce the population-weighted ambient concentration of ozone in all monitored counties by 14 percent from the 2003 baseline, compared to the eight percent cumulative reduction expected by 2008.		
By 2015, reduce the population-weighted ambient concentration of PM2.5 in all monitored counties by 6 percent from the 2003 baseline, compared to the 4 percent cumulative reduction expected by 2008.		
By 2014, reduce emissions of fine particles from mobile sources by 51,000 tons from a 2009 baseline level of 417,000 tons.		
By 2014, reduce emissions of nitrogen oxides (NOx) from mobile sources by 2.1 million tons from a 2009 baseline level of 9.3 million tons.		
By 2014, reduce emissions of volatile organic compounds from mobile sources by 1.1 million tons from a 2009 baseline level of 5.9 million tons.		
FY 2010 NAAQS - Air Monitoring	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
All state/local primary quality assurance organizations submit NAAQS pollutant data, PAMS, and QA data to AQS directly or indirectly through another organization according to schedule in 40 CFR Part 58.		RAPCA makes routine updates to the AQS database site file that includes adding monitor and site termination dates. These data are available to Region 5 for retrieval. In addition, Appendix E, a list of monitoring sites, was revised and included as a part of our FFY 2011 grant package. Copies were sent to Region 5 and to the NAMS coordinator in RTP.

¹ EPA Measures are from National Program Guidance at <http://www.epa.gov/ocfopage/npmguidance/index.htm>, 40 CFR 35 at <http://www.gpoaccess.gov/cfr/>, and EPA Regional Priorities.

FY 2010 NAAQS and Toxics - Ambient Monitoring	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
<p>Operate monitors for NAAQS pollutants, PM2.5 speciation, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs and QAPPs.</p>		<p>RAPCA continues to operate a comprehensive air quality monitoring network in accordance with the regulations specified in Title 40 Code of Federal Regulations (CFR) Part 58, as well as with U.S. EPA guidelines.</p> <p>RAPCA exceeds the minimum data capture of 75% and continues to track data completeness on a monthly basis.</p> <p>RAPCA continues to inform both Ohio EPA and U.S. EPA of changes to the network as they occur both by e-mail and as a follow-up to Ohio EPA revising the AQS monitor/site forms to reflect the change(s). RAPCA performs all phases of a network review regarding criteria pollutants and fine Particulate Matter (PM_{2.5}) annually.</p> <p>RAPCA annually revises Appendix E, the list of monitoring sites which is submitted to Ohio EPA, who in turn sends to U.S. EPA, and to the NAMS coordinator in RTP.</p>
<p>Certify 2009 NAAQS and toxics pollutant data in AQS and provide supporting documentation by May 1, 2010 (state/local only, unless tribal work plan requirement).</p>	<p>By May 1, 2010</p>	<p>RAPCA submits validated, edited ambient monitoring data into the Air Quality System (AQS) within 90 days of the conclusion of the quarter.</p> <p>RAPCA does not change certified data in the AQS without first notifying the Regional Office.</p> <p>RAPCA makes routine updates to the AQS database site file as necessary.</p> <p>Data submitted by entities pursuant to federal regulations are reviewed for completeness, accuracy, and compliance. Sources with delinquent or missing submissions are also identified in CETA. When appropriate, a</p>

		written analysis of the review of each submission (except for asbestos demolition/renovation notices) is prepared.
Submit 2011 annual network plan required by 40 CFR § 58.10, by May 1, 2010 unless another schedule has been approved (state/local only, unless tribal work plan requirement).	By May 1, 2010	<p>RAPCA works with Ohio EPA and U.S.EPA concerning the development of our network plans annually.</p> <p>RAPCA continues to inform both Ohio EPA and U.S. EPA of changes to the network as they occur both by e-mail and as a follow-up to Ohio EPA revising the AQS monitor/site forms to reflect the change(s). RAPCA performs a network review annually.</p>
Ensure adequate, independent QA audits of NAAQS monitors, including PEP and NPAP or equivalent (state/local only, unless tribal work plan requirement).		<p>RAPCA will participate in the Ohio EPA ozone certification/verification program for our ozone photometer.</p> <p>RAPCA will conduct performance audits as per 40 CFR Part 58, Appendix A.</p> <p>RAPCA will ensure that all quality assurance calibration equipment is up-to-date, calibrated, certified to NIST standards and in good working order. RAPCA will ensure that all quality assurance calibration equipment is replaced as age or lack of accuracy or performance requires it.</p> <p>RAPCA will ensure that all ozone calibration Standard Operating Procedures (SOP's) follow 40 CFR Part 58.</p> <p>RAPCA will continue to monitor and maintain sufficient monitoring staffing levels at our offices.</p> <p>RAPCA commits to participate in the Performance Evaluation Program (PEP) for accuracy and bias for PM2.5 offered by the Office of Air Quality Performance Standards.</p> <p>RAPCA will ensure that all ambient monitoring sites have the required</p>

		<p>amount of precision and accuracy checks in accordance with 40 CFR Part 58, Appendix A.</p> <p>RAPCA will ensure precision and accuracy data for criteria pollutants are submitted to Ohio EPA as stipulated in Part 58, Appendix A; Section 58.16 and 58.5.</p> <p>RAPCA will work to obtain the applicable precision and accuracy goals for all criteria pollutant monitoring data.</p>
Report as many air quality and meteorological parameters as possible real time to AirNow and continue (or expand) air quality forecasting.		<p>RAPCA monitors air pollution levels year-round and has established criteria for an Air Pollution Advisory, a day when high air pollution levels are likely. RAPCA, through monitoring and forecasting processes, is able to predict when air pollution levels will go beyond the health related AQI level of 100. This information is provided to the media and public on a daily basis and is available continuously via our web page and U.S. EPA AirNow web page, and a local air quality telephone line.</p> <p>For FFY 2010, RAPCA issued 10 APAs and measured 16 exceedances.</p> <p>RAPCA continues the entry of ozone and PM air quality forecasting data to the U.S. EPA's AirNow program.</p> <p>RAPCA reports exceedances of the National Ambient Air Quality Standards (NAAQS) to U.S. EPA on a quarterly basis. Ozone exceedances are reported on an as-they-occur basis.</p> <p>RAPCA staff from the monitoring and analysis unit continue to provide technical assistance for the Southwest Ohio Heat Watch/Warning system through Public Health-Dayton & Montgomery County. RAPCA provides information to the public in an attempt to reduce morbidity and mortality.</p>
Complete and submit the first 5-	By July 1, 2010	RAPCA participates with LADCO, USEPA Region 5 and OhioEPA in

year-cycle network assessment required by July 1, 2010, as required in 40 CFR 58.10(d). (State/local only, unless tribal work plan requirement).		performing the 5-year network assessment. This assists in completing and submitting our portion to Ohio EPA for inclusion in the total Ohio network assessment.
Fully implement NCore stations by January 1, 2011.	By January 1, 2011	RAPCA will comply with this date in preparing our rural NCore site in Preble County.
Implement lead monitoring at near-source locations, where required by January 1, 2010.	By January 1, 2011	Review of emission inventory data and source parameters show that no new near-source lead monitoring is required in RAPCA's jurisdiction.
Plan to implement lead monitoring at non near-source locations as part of each state's annual monitoring network plan due to EPA by July 1, 2010.		RAPCA's proposed population-oriented lead monitoring site is on hold until monitoring requirements are finalized (proposed December 30, 2009).
Attend the annual Region 5 State/Local/Tribal Air Monitoring Contacts meeting, the Triennial National Monitoring conference, the annual AQS conference and the annual QA conference.		RAPCA sent two representatives to the AQS conference on June 7 – 11, 2010, three representatives to the Air Quality conference on March 15 – 18, 2010, and several other staff to regional and state meetings which pertain to the management of monitoring data.

FY 2010 NAAQS - Criteria Pollutants	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Review air quality reports and take appropriate actions dealing with new violating attainment areas with any of the NAAQS.		RAPCA continues to review air quality reports and work with Ohio EPA to take appropriate measures as necessary for pollutants we are designated as nonattainment.

As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data.		RAPCA does not submit redesignation requests. We will assist Ohio EPA by providing any information they may need in developing the redesignation request.
Continue to implement 8-hr ozone SIPs.		This agency includes all applicable SIP rules in permit recommendations submitted to Ohio EPA. The agency also ensures the SIP rules are complied with during facility compliance inspections.
Submit any outstanding ozone SIP elements (including prior commitments).		RAPCA assists Ohio EPA and Miami Valley Regional Planning Commission (MVRPC) in developing Section 110 SIPs for the NAAQS standards in accordance with U.S. EPA's implementation schedule. RAPCA continues to stay informed of the activities of the U.S. EPA and NACAA workgroups. The RAPCA Administrator is participating in the Clean Air Act Advisory Committee Multi-pollutant Sector-Based workgroup.
Prepare recommendations on designations for revised NAAQS.		RAPCA assisted Ohio EPA in this endeavor providing supporting documentation as necessary.
Implement NOx and SO2 Requirements under CAIR.		Ohio EPA does not delegate the CAIR program to the local air agencies. This agency inspects CAIR facilities at least once every other year. As required, this agency incorporates the CAIR requirements in Title V renewal permits.
Continue to implement SIPs for 1997 PM 2.5 and ozone NAAQS.		This agency includes all applicable SIP rules in permit recommendations submitted to Ohio EPA. The agency also ensures the SIP rules are complied with during facility compliance inspections.
Begin SIP planning for 2006 PM2.5 NAAQS due no later than 2013.	No later than 2013	This agency does not directly develop SIP rules. We assist Ohio EPA by providing any information they may need in developing the 2013 PM2.5 SIP rules. The agency provides any comments on the draft rules as needed.
Work with local agencies to implement woodstove change-out programs in areas where change-		RAPCA completed a successful woodstove change-out program as part of an enforcement settlement in 2007. We continue to look for opportunities for this program.

outs could significantly reduce ambient particle concentrations.		
Explore feasibility of changing out existing outdoor wood-fired boilers to significantly reduce PM2.5 concentrations.		RAPCA is awaiting new rules on wood hydronic heaters from the Ohio EPA. After rules are out, we will develop, through the Ohio Local Air Pollution Control Officials Association (OLAPCOA), a change-out program using penalty/enforcement dollars.
Submit any outstanding PM _{2.5} and ozone SIP elements.		This agency does not directly develop SIP rules. We assist OhioEPA by providing any information they may need on outstanding PM2.5 and ozone SIP issues.
Consult with EPA as necessary to finalize area designations on revised 2008 ozone and lead NAAQS.		This agency assists Ohio EPA and U.S. EPA in developing the designations for ozone and lead in our six-county jurisdiction.
Work with local area stakeholders to support innovative, voluntary, early action initiatives such as wood smoke reduction programs.		RAPCA continues to work with OLAPCOA members and other interested parties to develop a wood hydronic heaters change-out program with available funding.

FY 2010 Regional Haze - Criteria Pollutants	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Continue to work with the Region 5 on issues related to submitted regional haze SIPs.		This agency does not directly develop SIP rules. We assist Ohio EPA by providing any information they may need on issues related to the regional haze SIPs.
Implement BART requirements.		This agency assists Ohio EPA to implement the BART requirements for any facilities in our jurisdiction.
Submit any outstanding regional haze SIP elements.		This agency does not directly develop SIP rules. We assist Ohio EPA by providing any information they may need on issues related to the regional haze SIPs.

FY 2010 - Permitting	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Ensure sources submit Title V applications for renewal. Due by January 31 and July 31.		RAPCA ensures that TV permit applications are submitted no earlier than 18 months and no later than 6 months prior to the Title V permit expiration date, per State of Ohio permitting rules.
Provide timeliness data on new title V permits and significant permit modifications to EPA Regional offices for entry into TOPS.		This agency provides Ohio EPA with all needed information to meet this output/measure.
Continue to issue initial permits, significant modifications and renewal Title V permits and reduce backlog of renewal permits.		<p>RAPCA continues to meet all permitting time lines as established in the Ohio permitting guidance.</p> <p>For FFY 2010, we prepared 9 permits to install (PTI); 103 administrative modifications to PTIs, 68 initial permits to install/operate (PTIOs), federally enforceable permits to install/operate (FEPTIOs), general PTIOs, and Chapter 31 modifications; 101 “Transitional” PTIO and FEPTIOs, 80 permits by rule, 279 emissions unit withdrawals, and voided 47 permit applications.</p> <p>Additionally, we processed 15 Title V permit actions (i.e., we recommended issuance to Ohio EPA of a draft, PPP or PP); and of the Title V permit actions pending with the Ohio EPA, 16 Title V permits were issued in various stages. During FFY 2010, 5 Title V permit renewals were issued final. We also reviewed 42 Title V Fee Emission Reports and 70 Synthetic Minor Title V Fee Emission Reports.</p> <p>All permit actions were completed in a timely manner.</p>
Cooperate with EPA in Title V		This agency provides EPA with any needed information as a result of any

permit program evaluations, set target to respond within 90 days to EPA's evaluation report and implement recommendations as warranted.		Title V permit program evaluations. We work with Ohio EPA to implement any appropriate recommendations.
Issue new Title V permits and significant permit modifications within 18 months of application completeness determined by permitting authority.		This agency works with Ohio EPA to issue new Title V permits and significant permit modifications within 18 months of application completeness.
Issue 78 % of major NSR permits within one year of receiving a complete permit application.		The OAC requires the state to issue NSR permits within 180 days of receipt of a complete application; RAPCA ensures this timeline is followed.
Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RBLC.		This agency includes all applicable rules and appropriate monitoring, record keeping and reporting in the terms and conditions of all NSR permits. This agency provides Ohio EPA with any needed information so BACT/LAER determinations can be entered in the RBLC.
Percentage of timeliness data on NSR permits issued for new major sources and major modifications, submitted to the RBLC national database within 120 days of permit issuance. Data submission must include "the application accepted date" and "the permit issuance date."	Within 120 days of permit Issuance	Ohio EPA enters information into the RBLC national database. They do not delegate this duty to our agency. This agency provides Ohio EPA with any needed information so BACT/LAER determinations can be entered in the RBLC.
PSD-delegated States (IL and MN) coordinate with EPA to ensure that Endangered Species Act consultations are handled in a timely manner.		Not applicable.

Provide PSD and NNSR permit applications to EPA prior to the start of the public comment period.		This agency provides U.S. EPA copies of PSD and NNSR permit applications within two weeks of receipt of the application.
Objective 1.1 - Healthier Outdoor Air - Through 2014, working with partners, protect human health and the environment by attaining and maintaining health-based air-quality standards and reducing the risk from toxic air pollutants.		
Sub-Objective: 1.1.2 - Reduce Air Toxics		
Outcomes		
By 2014, reduce toxicity-weighted (for cancer risk) emissions of air toxics to a cumulative reduction of 34 percent from the 1993 non-weighted baseline of 7.24 million tons, maintaining the 34 percent cumulative reduction expected by 2006.		
By 2014, reduce toxicity-weighted (for non-cancer risk) emissions of air toxics to a cumulative reduction of 59 percent from the 1993 non-weighted baseline of 7.24 million tons, compared to the 58 percent cumulative reduction expected by 2006.		
FY 2010 Air Toxics	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Emission Inventory: (1) Develop HAP emission inventories for submission to EPA's National Emissions Inventory (NEI) database; (2) Quality assure, validate, and revise NEI data; and (3) Participate in Regional emission inventory workgroup conference calls.		<p>RAPCA developed a 2009 Title V facility emissions inventory and HAP emission inventory in FFY2010.</p> <p>A complete and accurate inventory continues to be maintained for all federally regulated sources. Ohio EPA submits EIS data for the state of Ohio, including RAPCA's jurisdiction, in compliance with the Consolidated Emissions Reporting Rule. Ohio EPA has software that extracts this information from STARS2, processes it into the correct format and will submit to U.S.EPA. RAPCA assists Ohio EPA in the process by examination of the fee emission reports which are submitted to STARS2 annually by facilities.</p> <p>RAPCA continues to communicate promptly with U.S. EPA and Ohio EPA regarding any hot topics such as difficult applicability determinations and community issues. Regular communication on program and permit issues is also maintained through the monthly program enforcement calls</p>

		and through OLAPCOA. We participate in all enforcement and permitting calls.
Implement delegated or approved section 112 (major and area source), 111(d) and 129 standards,		This agency continues to work with Ohio EPA to implement all section 112, 111(d), and 129 standards for which Ohio EPA has received delegation.
Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting.		RAPCA participates in the quarterly State/Region 5 air toxics conference calls. In addition, this agency continues to promote communication, coordination, and cooperation with all levels of government, the regulated community and the public in the area of air toxics.
Review and analyze NATA data, as available. R5 will provide timely access to and assistance to the review of the NATA data.		RAPCA is reviewing 2005 NATA data to assess impacted census tracts and source sectors responsible for air toxics risks.
Participate in research projects, policy issues and task forces that address identification and reduction of persistent bioaccumulative air toxic pollutants.		RAPCA actively participates in research projects when appropriate and necessary.
States will look to address and assess public exposure to air toxics (states could substitute specific language i.e. RAIMI, DATI extension work, Southwest Indianapolis). Work with communities to develop and implement voluntary air toxics programs that address outdoor, indoor, and mobile sources with emphasis on areas with potential		<p>RAPCA currently participates in the city of Dayton Environmental Advisory Board, which consists of local government, health departments, park districts and citizen representatives to address air toxics situations in the Dayton area. In addition, RAPCA participates in citizen forums and meetings that are source-oriented (e.g. Clean Water LTD., CEMEX, and City of Dayton Wastewater Treatment Plant).</p> <p>RAPCA staff actively participate in the National Association of Clean Air Agencies committees, including Training, Criteria Pollutants, New Source Review, Permitting, Global Warming, Toxics, and Monitoring.</p>

environmental justice concerns.		
<p>Look for opportunities to reduce risk from air toxics through voluntary programs such as Burn Barrels, Wood Stove Change-outs, and opportunities to integrate indoor air programs such as Tools for Schools, Asthma, and ETS. Continue efforts focused on monitoring and reduction activities related to sources that emit mercury and products that contain mercury and implement the necessary tools to reduce and/or eliminate the use and/or release of mercury to the environment.</p>		<p>RAPCA continues to assess where voluntary ozone and PM2.5 control measures make sense and commit to work to implement voluntary control measures.</p> <p>Voluntary projects include:</p> <ul style="list-style-type: none"> a. Diesel retrofit projects that qualify under U.S. EPA’s voluntary retrofit program and partnering with entities applying for grant awards in this area; b. RAPCA encourages school districts to develop and implement anti-idling policies and diesel retrofits to reduce exposure to diesel emissions; c. Potential emission reductions from diesel fleets through the use of contract language for applicable construction projects and school bus contracts; anti-idling initiatives; d. Work with vendors and encourage lawnmower replacement programs throughout our jurisdiction; and e. Identifying other voluntary programs for early reductions for ozone and PM as well as air toxics. <p>RAPCA identifies potential sources of mercury emissions and requests information from facilities with these sources. RAPCA investigates methods to reduce point source mercury emissions to the atmosphere.</p>
<p>Objective 1.5 - Reduce Greenhouse Gas Emissions - Through 2014, continue to reduce greenhouse gas emissions through voluntary climate protection programs that accelerate the adoption of cost-effective greenhouse gas reducing technologies and practices.</p>		
<p>Sub-Objectives: 1.5.1 - Reduce Greenhouse Gas Emissions</p>		

Outcomes		
By 2014, 53 million metric tons of carbon equivalent (MMTCE) will be reduced in the buildings sector (compared to 31 MMTCE reduced in 2006) through EPA's voluntary climate protection programs.		
By 2014, 112 million metric tons of carbon equivalent (MMTCE) will be reduced in the industry sector (compared to 69 MMTCE reduced in 2006) through EPA's voluntary climate protection programs.		
By 2014, 20 million metric tons of carbon equivalent (MMTCE) will be reduced in the transportation sector (compared to 0.6 MMTCE reduced in 2006) through EPA's voluntary climate protection programs.		
FY 2010 Criteria Pollutant	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Continue to support the Midwest Clean Diesel Initiative including the management of state clean diesel grants, active involvement in state clean diesel coalitions, Smartway, and the promotion, generation, and implementation of clean diesel funding, programs, projects, and policies.		RAPCA continues to support the Clean Diesel Initiative by partnering with local government agencies such as the City of Dayton, area school districts, and the Southwestern Ohio Educational Purchasing Council to find funding for clean diesel projects. RAPCA is a regular signatory on the national DERA Reauthorization letter.
FY 2010 Air Toxics	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Work collaboratively to address climate change and reduce greenhouse gas emissions through participation in R5-States Climate Change conference calls every other month, EPA voluntary programs including Energy Star, the Green Power Partnership,		RAPCA participates in the NACAA Climate Change subcommittee conference calls, and local initiatives such as Dayton Regional Green Task Force and the Montgomery County Green Initiative. Also, RAPCA is pursuing ICLEI membership, which will be employed to develop a six-county greenhouse gas inventory. RAPCA participates in the Quicksilver Caucus and the National Vehicle Mercury Switch Recovery Program by conducting outreach to scrap yards

<p>Combined Heat and Power, Climate Leaders, and non-CO₂ reduction programs.</p>		<p>in our jurisdiction.</p> <p>RAPCA continues to work collaboratively to address climate change and reduce greenhouse gas emissions through participation in Region 5-States Climate Change conference calls every other month, EPA voluntary programs including Energy Star, the Green Power Partnership, Combined Heat and Power, Climate Leaders, and non-CO₂ reduction programs.</p> <p>RAPCA responds to complaints received concerning CFC releases into the atmosphere.</p> <p>RAPCA continues to participate in activities such as education/outreach on stratospheric ozone, Title VI, and/or climate change.</p> <p>RAPCA continues to provide Title VI information and respond to complaints to affected parties. Ohio EPA continues to participate in activities within Ohio that deal with environmental impacts of ozone depleting substances and technologies that impact the release of global warming emissions.</p> <p>The RAPCA Administrator participated in the Clean Air Act Advisory Committee Green House Gas Best Available Technology workgroup.</p>
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Goal: 5 - Compliance and Environmental Stewardship²		
Objective 5.1 - Achieve Environmental Protection through Improved Compliance - Address environmental problems, promote compliance and deter violations, by achieving goals for national priorities and programs including those with potential environmental justice concerns and those in Indian country.		
Sub-Objectives: 5.1.1 - Address Environmental Problems from Air Pollution (was compliance assistance)		
Outcomes		
RAPCA conducted anti-tampering law inspections in 2010 with the loss of the local E-check (I/M) program. RAPCA completed four anti-tampering inspections in FY 2010.		
RAPCA conducted inspections of indoor air concerns in commercial buildings and schools and distributed indoor air quality information packets including EPA literature on mold, radon, asthma triggers, and other indoor air pollutants. Packets were distributed via mail, on-site inspections and participation in local health and environmental festivals.		
RAPCA cooperated with the Ohio Department of Health in the development and implementation of initiatives to address indoor air quality.		
Enforcement - Air Toxics	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Enforcement-Air Toxics is modeled as part of RAPCA's permit process to ensure that the facilities meet the Air Toxics Standards as set forth by USEPA.		
Enforcement - Monitoring	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Submit draft Compliance Monitoring Strategy (CMS) plan	May 1, 2010	In accordance with the Federal Compliance Monitoring Strategy (CMS), RAPCA will implement its two-year inspection plan for fiscal years 2010

² For Compliance and Enforcement National Priorities see <http://www.epa.gov/compliance/assistance/bystate/caa/index.html>

for review, negotiation and approval by EPA. Implementation of the final CMS plan will begin the upcoming federal fiscal year.	October 1, 2010	and 2011 to be approved in 2009 by the Ohio EPA and U.S. EPA. The two-year inspection plan for fiscal years 2010 and 2011 was submitted on August 10, 2009. An updated 2011 schedule was submitted on September 17, 2010.
Sources/landfills subject to the asbestos NESHAP regulations will be inspected in accordance with EPA's Implementation Strategy for Revised Asbestos NESHAP guidance.	Ongoing	This agency inspects annually all sources/landfills subject to the asbestos NESHAP regulations. During FFY 2010, RAPCA processed 250 State/Federal Notifications; 140 State/Federal Inspections; and 7 Local Notifications. In asbestos related cases alone, 7 Notice of Violations and 3 Findings and Orders were issued in FFY 2010.
Conduct inspections of asbestos demolition and renovation projects which notification was submitted to this agency.		RAPCA conducts inspections and enforcement activities for its asbestos program in accordance with the U.S. EPA Asbestos NESHAP. In FFY 2010, RAPCA responded to 803 Asbestos related inquiries, 14 public complaints, and performed 14 inspections from those complaints.
Respond to air quality complaints in a timely manner.		RAPCA responds to air quality complaints within one business day. In FFY 2010, RAPCA investigated 99 open burning complaints, and operate a very active local open burning permit program. RAPCA responded to 22 complaints at Title V facilities, 24 complaints at non-Title V facilities, and 57 other complaints. RAPCA follows up on all anti-tampering complaints and completed 1 inspection per quarter for a total of 4 anti-tampering inspections for FFY 2010.
Enforcement - Reporting	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
Submit compliance and	60 day reporting as	This agency submits the required information into Ohio EPA's compliance

<p>enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the sixty (60) day standard required for reporting by the 2005 Air Facility System (AFS) Information Collection Request (ICR). Ensure data is complete, accurate and timely consistent with EPA policies and ICR. Such language should be included in the written agreement between the State and EPA.</p>	<p>required by ICR</p>	<p>and enforcement tracking application in a timely manner.</p>
<p>For States that administer authorized programs under Title 40 and receive or wish to receive reports or documents electronically under those authorized programs must ensure the designated program system meet and comply with the Cross-Media Electronic Reporting Regulation (CROMERR), Part 3, Title 40 effective 01/11/06. In accordance with the CROMERR regulation, before the implementation the designated State program system must be approved by EPA.</p>	<p>Ongoing</p>	
<p>Asbestos notification information, compliance evaluations and</p>	<p>Quarterly</p>	<p>RAPCA will continue to submit quarterly reports pertaining to asbestos activities through Asbestos Contractor Tracking System (ACTS) as</p>

enforcement activities will be reported on a quarterly basis to EPA by the State.		required.
Enforcement	EPA Contact (s):	State/Local Contact (s)
Outputs/Measures	Progress Target Dates	Progress Made in Meeting Outputs and Outcomes
State will hold monthly conference calls with EPA to discuss their efforts to resolve known violators. During these conference calls, newly discovered violators will be identified and discussions on the date, case lead, evidence, timeline for resolution and status of case.	Monthly	<p>This agency participates in enforcement conference calls with OhioEPA and USEPA every 4-6 weeks. We also regularly participate in the NACAA enforcement committee calls and activities.</p> <p>In FFY 2010, RAPCA reviewed 7,323 compliance reports, wrote 93 field orders, 96 warning letters, 15 notices of violation, completed 4 local findings and orders, and submitted 1 enforcement action request to Ohio EPA.</p> <p>Surveillance was performed on 1,959 occasions and visible emissions readings were taken on 81 occasions.</p> <p>As part of our ongoing educational efforts RAPCA issued 262 informational letters to either industry or to the public.</p> <p>Additionally, we witnessed 67 stack tests, submitted 166 appendix K forms and conducted 104 site visits.</p>
State will conduct its enforcement activities in accordance with EPA Timely and Appropriate Enforcement Response to High Priority Violations policy (HPV), the Clean Air Act Stationary Source Civil Penalty policy and	Ongoing	RAPCA conducts its enforcement activities in accordance with EPA Timely and Appropriate Enforcement Response to High Priority Violations policy (HPV), the Clean Air Act Stationary Source Civil Penalty policy and the Revised Asbestos NESHAP Strategy.

<p>the Revised Asbestos NESHAP Strategy.</p>		
<p>RAPCA will conduct full compliance evaluations (FCE) of Title V and non-Title V facilities per the Ohio EPA contract.</p>		<p>During FFY 2010, RAPCA completed FCEs at 36 Title V facilities, 36 synthetic minor facilities, and 37 minor facilities; these FCEs included 69 NESHAP/MACT/NSPS inspections.</p> <p>Additionally, we witnessed 360 tests of Gasoline Dispensing Facilities (GDF). An additional 56 GDFs conducted retests due to failures which RAPCA witnessed during FFY 2010.</p>