# U.S. Environmental Protection Agency
# Region 5
# Air and Radiation Division

# Michigan Department of Environmental Quality
# Clean Air Act, Section 105
# and
# Air Program Portion of Performance Partnership Grant
# Work Plan Program Elements

## For Fiscal Year 2012 Funding

## EXECUTIVE SUMMARY

The following are work plan program elements for Work Plans for Clean Air Act (CAA), Section 105 grants or the air program component in Environmental Performance Partnership Grant or Agreements (PPG or PPA) submitted to the Environmental Protection Agency (EPA), Region 5. You may use any format you choose, however, we request that you include the program elements in your work plan from the categories indicated below.

### Purpose of the Air Pollution Control Program Work Plan

The purpose of document is to identify air program goals, objectives, and commitments necessary to support a grant for an air pollution control program. This document identifies the priorities, work to be accomplished, and describes how your Agency and EPA will work together for the benefit of the public and the environment. The development and implementation of your work plan - the decisions regarding the establishment of goals, objectives, priorities, components, and evaluation of your Agency's progress – directly involves managers in both agencies.

EPA and the state and local agencies' responsibilities include meeting federal and state environmental requirements; outlining how both agencies will collaborate to achieve joint priorities; identify work commitments and corresponding reporting requirements. Your work plan applies to activities and results your Agency will complete and accomplish by October 1, 2011 through September 30, 2012.

### Roles of Grantee and Region 5 EPA

This document defines the roles of the Michigan Department of Environmental Quality (MDEQ) and EPA Region 5 will undertake to meet the program commitments outlined in the Work Plan. MDEQ and EPA recognize the primary role of MDEQ in administering Federal environmental programs delegated to the state under Federal law and in carrying out state programs prescribed under State law. EPA Region 5's role in assisting MDEQ includes: addressing multi-State or national issues directly; implementing programs not delegated to MDEQ; and working on targeted sectors, watersheds or airsheds in conjunction with MDEQ. Several activities are common to both MDEQ and EPA Region 5, such as permitting, compliance, enforcement, monitoring and outreach.

### Work Plan Components

The program elements in this document are recommended to be included in your Clean Air Act, Section 105 work plan or in your PPG or PPA. You may use any format you choose, however, please include in your work plan:

1. **EPA Goal** (identified in this document)
2. **EPA Objectives** (identified in this document)

3. **Essential air pollution control program elements** – criteria pollutants, permitting, air monitoring, air toxics, and enforcement and compliance assurance. These should relate back to the EPA goals and objectives
4. **The outputs/measures**, i.e., activities and commitments) that are linked to each Goal and Objective and essential air program elements
5. **A time-frame** for completion of each activity
6. **Air Program Priorities** – Joint Priorities; State specific priorities, and areas for disinvestment, if applicable
7. **Quality Assurance**
8. **Administrative Requirements**
9. **Budget** – Including detail and narrative
10. **EPA Work Plan Components** – Link the scope of work to EPA's Strategic Plan, Goals 1 or 5, Outcomes (short-term, medium-term, long-term), Outputs (activities and measures), Progress Target Dates, and Status/Progress Comments (due when reporting required).

Including the elements listed above in your work plan will help to ensure that your work plan meets EPA's air program goals and objectives and is in conformance with EPA's recently issued Grants Policy Issuance (GPI) 11-03, "State Grant Workplans and Progress Reports."

## AIR PROGRAM PRIORITIES

### Joint Air Program Priorities

The identification of joint priorities and opportunities for MDEQ and EPA Region 5 to collaborate to achieve environmental improvement will occur through program to program discussions. The process highlights the overall priority between EPA Region 5 and MDEQ to focus increased efforts on measuring and managing for environmental results. The Joint Priorities as listed below have been incorporated into the work plan for each of the programs.

The joint priorities identified should be consistent with the EPA Office of Air and Radiation National Program and Grant Guidance (pages 2-3) and Regional priorities. The Regional Priorities include addressing Midwest Air Quality, which includes the Midwest Clean Diesel Initiative. Addressing Climate Change and Clean Energy is also a Regional priority, and Homeland Security continues to be a priority. When possible and practicable, the joint priorities should take into consideration environmental justice areas in areas of air quality work being performed, working with the communities for healthier air quality, and working with communities and other stakeholders to build strong partnerships.

Grantee should negotiate air program priorities with EPA, Region 5, Air and Radiation Division. EPA's national program priorities related to the air program are:

- Taking Action on Climate Change
- Improving Air Quality
- Cleaning Up Our Communities

- Expanding the Conversation on Environmentalism and Working for Environmental Justice; and
- Building Strong State and Tribal Partnerships.

ARD is especially interested in the following:

- Issuance of timely compliance permits and addressing Title V backlogs (recognizing the latter is not covered by Section 105).
- Promoting energy efficiency and renewable energy in air quality planning, permitting, and enforcement.
- Reducing air toxics - emphasis on children's health and disproportionately impacted areas.

Please consider EPA's National and Regional priorities to improve air quality as you negotiate your priorities with the Air and Radiation Division. Past Joint Priorities have included:

- Midwest Clean Diesel Initiative
- Clean Energy and Climate
    - Reduce greenhouse gas emissions
    - Enhance voluntary programs
- An Air Toxics study, project, or program development
- Homeland Security/Emergency Response

**State/Local Air Program Priorities**

- Securing Renewable Operating Permit (ROP) fees at a level that will provide an adequate and sustainable program.
- Review and update air quality rules to provide clarity, certainty, and minimize duplicative requirements.
- Timely and efficient review of Permit to Install and Renewable Operating Permit applications.
- Continuing the Air Toxics program possibly with reforms.
- Implementing ambient air quality requirements where financially practicable and maintain ambient air quality monitoring programs to the extent practicable.

**Areas for Disinvestment (if applicable)**

The grantee should identify any areas for air program disinvestment here, in the event funding is reduced, redirected to support other priorities, or is otherwise not available. The grantee should develop a strategy for disinvestments.

QUALITY ASSURANCE

### Quality Assurance Management Plan

Because the programs included under your Work Plan, involve the collection and use of environmental data by the Recipient on EPA's behalf, the Recipient is also required to operate these programs following an approved Quality Management Plan (QMP). Through Federal Regulations, EPA requires that recipients of funds for work involving environmental data comply with the American National Standard – Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs. The Recipient's QMP approved by EPA on, documents how the Recipient will comply with those provisions.

The Recipient and EPA have agreed that the Recipient will continue to approve project-level Quality Assurance Project Plans (QAPPs).

EPA is required to assess the implementation of the approved Quality Management Plan. To facilitate these assessments, the Recipient will submit a letter to EPA Region 5 each year which"

- identifies any minor revisions needed and/or incorporated into the QMP during the preceding year,
- confirms that the QMP approved by EPA is still in effect; and
- identifies QAPPs approved by the Recipient for environmental programs encompassed by the QMP.

### Management System

The Recipient has in place policies and standard operating procedures in order to manage the grant funds associated with completing the work plan components outlined below.

MDEQ has an extensive set of Operating Instructions pertaining to all functions within the department.

## ADMINISTRATIVE REQUIREMENTS[1]

A. **Work Plan Negotiations.** The Recipient will participate in negotiations with EPA to submit a final grant work plan and application that contains Environmental Results Outputs, Outcomes, and links work to EPA's Strategic Goals.

   Recipient has the option to use the suggested "Work Plan Template" in this document to develop their work plan. Additional Measures and Target Dates should be completed by the recipient when negotiating the work plan components with EPA. The Status/Progress Comments column should be completed by Recipient as part of the Annual Performance Report.

B. **Annual Meeting.** The Recipient will participate with EPA in an annual meeting to discuss Air Program issues.

[1] See 40 CFR 35.107 for administrative requirements.

C. **Performance Evaluation Process and Reporting Schedule.** The Recipient will include in the work plan a performance evaluation process and reporting schedule in accordance with Section 35.115 of 40 CFR 35.107.

D. **Time Frames for Progress.** The Recipient will include in the Work Plan commitments for each program measure and a time frame for their accomplishment.

E. **Reporting Requirements.** MDEQ will continue to report to EPA the necessary information as required and agreed upon, including required timelines. It is recognized that reporting requirements beyond those specifically mentioned in this agreement do exist. Those requirements often relate to populating national databases or to tracking performance against priority activities identified in the internal MDEQ work plans. These requirements may be embodied in a variety of existing agreements and are not reiterated in this work plan.

A Final Report that prominently displays the linkage to EPA's Goal, Objectives, outputs/measures and timeframes outlined in the work plan, pursuant to EPA's Grants Policy Issuance (GPI) 11-3, "State Grant Workplans and Progress Reports," shall be submitted to the EPA Air Project Officer within 90 days after the project period has ended.

The administrative closing documents shall be submitted to EPA's Assistance Section and the Final Financial Federal Report shall be submitted to the EPA Las Vegas Finance Center within 90 days after the project period has ended.

F. **End-of-Year Progress Report.** The Recipient will submit a comprehensive end-of-the-year progress report that prominently displays the linkage to EPA's Goal, Objectives, outputs/measures and timeframes outlined in the work plan, pursuant to EPA's Grants Policy Issuance (GPI) 11-3, "State Grant Workplans and Progress Reports" within 90 days after one-year of the project start date.

## ESSENTAIL AIR POLLUTION CONTROL PROGRAM ELEMENTS

**The following outputs/measures, as well as Strategic Measures/Outcomes, should be included in Recipient's Work Plan.**

| **Strategic Goal: 1 – Taking Action on Climate Change and Improving Air Quality**[2] | | | |
|---|---|---|---|
| **Objective 1.1: Address Climate Change.** Reduce the threats posed by climate change by reducing greenhouse gas emissions and taking actions that help communities and ecosystems become more resilient to the effects of climate change. | | | |
| **2011- 2015 Strategic Measures (Outcomes) - Address Climate Change**[3] | | | |
| By 2015, the light-duty vehicle greenhouse gas rule will achieve reductions of 99 $MMTCO_2Eq$. | | | |
| By 2015, additional programs from across EPA will promote practices to help Americans save energy and conserve resources, leading to expected greenhouse gas emissions reductions of 740.1 $MMTCO_2Eq$. from a baseline without adoption of efficient practices. This reduction compares to 500.4 $MMTCO_2Eq$. reduced in 2008. | | | |
| By 2015, EPA will integrate climate change science trend and scenario information into five major scientific models and/or decision-support tools used in implementing Agency environmental management programs to further EPA's mission, consistent with existing authorities. | | | |
| By 2015, EPA will account for climate change by integrating climate change science trend and scenario information into five rule-making processes to further EPA's mission, consistent with existing authorities. | | | |
| By 2015, EPA will build resilience to climate change by integrating considerations of climate change impacts and adaptive measures into five major grant, loan, contract, or technical assistance programs to further EPA's mission, consistent with existing authorities. | | | |
| **FY 2012 Air Toxics – Toxics and Global Atmosphere** | | | |
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| | | | |

| Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants. | | | |
|---|---|---|---|
| **2011 – 2015 Strategic Measures (Outcomes) - Reduce Criteria Pollutants and Regional Haze** | | | |
| By 2015, the population-weighted average concentrations of ozone (smog) in all monitored counties will decrease to 0.073 ppm compared to the average of 0.078 ppm in 2009. | | | |
| By 2015, the population-weighted average concentrations of inhalable fine particles in all monitored counties will decrease to 10.5 $\mu g/m^3$ compared to the average of 11.7 $\mu g/m^3$ in 2009. | | | |
| By 2015, reduce emissions of nitrogen oxides ($NO_x$) to 14.7 million tons per year compared to the 2009 level of 19.4 million tons emitted. | | | |
| By 2015, reduce emissions of sulfur dioxide ($SO_2$) to 7.4 million tons per year compared to the 2009 level of 13.8 million tons emitted | | | |
| By 2015, reduce emissions of direct particulate matter (PM) to 3.9 million tons per year compared to the 2009 level of 4.2 million tons emitted. | | | |
| **FY 2012 Federal Vehicle and Fuels Standards and Certification – Control Strategies** | | | |
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| Work with EPA in preparing SIPs and developing, implementing, and transitioning mobile source control strategies such as I/M, OBD, and state fuel programs. | Summer months | MDEQ will continue to meet Ozone SIP requirements via s.e. Mi low vapor pressure fuel. | |
| Work with local Metropolitan Planning Organizations, EPA, and state and federal transportation agencies in future conformity determinations, as needed. | FY 2012 | MDEQ will participate in the Conformity Interagency Workgroup meetings and review conformity analysis. | |
| Continue to develop and submit control strategy SIPs and maintenance plans with motor vehicle emission budgets based on MOVES. | FY 2012 | MDEQ will continue to develop and submit control strategy SIPs and maintenance plans with motor vehicle emission budgets based on MOVES. | |

| | | | |
|---|---|---|---|
| Work with EPA to develop creditable mobile source programs. | FY 2012 | MDEQ will work with EPA to develop creditable mobile source programs as needed. | |
| 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. | FY 2012 | MDEQ will 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. | |

| FY 2012 NAAQS Ambient Air Monitoring | | | |
|---|---|---|---|
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| Operate monitors for other NAAQS pollutants, NCore and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs and QAPPs. | On-going | The AMU will continue to operate its monitoring network in accordance with EPA approved standard operating procedures, following its Quality Assurance Project Plan (QAPP) and the MDEQ Quality Management Plan (QMP). AMU standard operating procedures will be updated as necessary.<br><br>The AMU will strive for greater than 75 percent complete data for all State and Local Ambient Monitoring Station (SLAMS) sites and at least 90 percent complete data at the Dearborn NATTS site.<br><br>The AMU will also continue to operate the Michigan Toxics Air Monitoring Network (MITAMP) as described in its 2012 Ambient Air Monitoring Review and will continue to collaborate with the Minnesota Air Pollution Control Agency and the Wisconsin Department of Natural Resources on the deployment of the ambient mercury monitoring trailer. | |
| All state/local primary quality assurance organizations submit NAAQS pollutant data, PAMS, and QA data to AQS | On-going | The AMU will continue to process and report air quality data as well as precision and accuracy data to AQS within 90 days of the end of each calendar quarter. If agreed upon in a Memorandum of | |

| | | | |
|---|---|---|---|
| directly or indirectly through another organization according to schedule in 40 CFR Part 58. | | Understanding, AMU will also upload that ambient air quality data collected by the Little River Band of Ottawa Indians and the Inter-Tribal Council of Michigan. | |
| Certify 2011 NAAQS and toxics pollutant data in AQS and provide supporting documentation by May 1, 2012 (state/local only, unless tribal work plan requirement). | By May 1, 2012 | The AMU will certify its 2011 ambient air monitoring (and related quality assurance data) to the U.S. EPA by May 1, 2012. If agreed upon in a Memorandum of Understanding, AMU will also certify that ambient air quality data collected by the Little River Band of Ottawa Indians. | |
| Submit XML-formatted AQS data by the end of 2012 or at the latest the end of 2013. | By the end of 2013 | AMU will investigate the plausibility of submitting data to AQS via the data node by the end of 2013, contingent upon adequate EPA funding and technical resources. | |
| Submit 2013 annual network plan required by 40 CFR § 58.10, by July 1, 2012, unless another schedule has been approved (state/local only, unless tribal work plan requirement). The plan should provide for the movement or start-up of additional ozone monitoring stations associated with smaller urban areas and non-urban areas, if required. If finalized the ozone monitors should be operational the first day of ozone season in | July 1, 2012 | AMU will submit its 2013 network review to the U.S. EPA by July 1, 2012. Activities associated with this network review are tie-barred with the April 7, 2011 LADCO letter.<br><br>AMU will commit to conducting new near roadway NO2 monitoring at two sites near the Eliza Howell Park in Detroit and SO2 monitoring where it can be accomplished without establishing new shelters.<br><br>It is problematic for AMU to commit at this time to new ozone monitoring activities before seeing what is contained in new EPA regulations and guidance. | |

| | | | |
|---|---|---|---|
| 2013. The plan should also consider SO2 monitoring required in Core Based Statistical Areas (CBSA's) based on population and emissions. All new SO2 monitoring is required to be operational by January 1, 2013. The plan should also consider NO2 Roadway monitoring requirements. All new NO2 Roadway monitoring is required to be operational by January 1, 2013. | | | |
| Ensure adequate, independent QA audits of NAAQS monitors, including PEP and NPAP or equivalent (state/local only, unless tribal work plan requirement). | On-going | AMU staff will certify a primary ozone standard at the U.S. EPA, Region 5 offices prior to the deployment of its ozone monitors in March 2012.<br><br>The AMU will participate in any mandated inter-laboratory, NPAP or Performance Evaluation Program (PEP) audits.<br><br>Solutions for technical deficiencies found in any U.S. EPA National Performance Audit Program (NPAP) audits will be submitted within 30 days, in accordance with Title 40 of the Code of Federal Regulations (CFR) §58.25.<br><br>The AMU will continue to collect | |

| | | | |
|---|---|---|---|
| | | precision and accuracy data in accordance with our standard operating procedures.<br><br>If agreed upon by Memorandum of Understanding, the AMU will also audit the ozone monitor operated by the Little River Band of Ottawa Indians. In addition, the AMU will work with Region 5 to assist other Michigan Tribes conducing ambient air monitoring where appropriate and resources allow. | |
| Report real time ozone and $PM_{2.5}$ data to AirNOW for cities required to report the AQI (state/local only). | On-going | The AMU will continue to collect and upload hourly PM2.5, ozone, and meteorological data to AIRNOW and to the MDEQ MIair web site.<br><br>AMU will also publish an annual air quality report by September 30, 2012. | |
| Implement second phase lead monitoring at source-oriented locations (.5 to 1 tons per year. | By December 27, 2011 | AMU new lead monitoring for one year at both the Oakland County Airport and in Vassar. AMU will investigate the possibility of monitoring lead in East Jordan, given adequate funding and staffing. | |
| Implement lead monitoring at non-source-oriented At NCore sites in CBSAs over 500,000 people | By December 27, 2011 | AMU is currently monitoring for lead at its Grand Rapids-Monroe Street and Allen Park NCORE sites and at its Dearborn NATTS site. | |
| Attend the annual Region 5 | To be | Given adequate funding, AMU staff will | |

| | | | |
|---|---|---|---|
| State/Local/Tribal Air Monitoring Contacts meeting, Participate in the monthly S/L/Tribal monitoring calls. Attend the Triennial National Monitoring conference, the annual AQS conference and the annual QA conference if they are held. | determined<br><br>Twice Yearly<br><br>To be determined | attend the annual Region 5 State, Local, Tribal air monitoring contacts meeting in Chicago.<br><br>In addition, if financial support from the Lake Michigan Air Directors Consortium continues, AMU staff will continue to represent the MDEQ and the other State Agencies on the National Association of Clean Air Agencies' monitoring steering committee.<br><br>Given adequate funding, the AMU staff will attend the national AQS conference in 2012. | |

| FY 2012 NAAQS - Attainment Planning and Maintenance | | | |
|---|---|---|---|
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| Review air quality reports and take appropriate actions dealing with new violating attainment areas with any of the NAAQS. | FY12 | For new violating attainment areas, MDEQ will pursue required procedures of proposing nonattainment boundaries and developing SIPs to address the violation. | |
| As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data. | | PM2.5 SIP redesignation submitted in FY11; no additional redesignations expected in FY 12. | |

| | | | |
|---|---|---|---|
| Continue to implement 8-hr ozone SIPs. | FY12 | State currently in attainment. Maintenance areas will continue requirements. | |
| Prepare recommendations on designations for revised NAAQS. | Per impl. Guidance 1 yr. from new std. | If new ozone NAAQS out, MDEQ will propose new nonattainment areas as necc. Other NAAQS as appropriate | |
| Facilitate implementation of NOx and SO2 Requirements under Transport Rule. | FY 12 | Will work with CAMD and affected utilities to ensure proper allocations, etc.<br>Work on revision of state CAIR rule to address requirements in Transport Rule. | |
| Consult with EPA, as necessary, to finalize area designations for the NO2 primary and SO2 primary NAAQS. | NO2 by Feb 2012<br><br>SO2 by June 2012 | MDEQ will consult with EPA, as necessary, to finalize area designations for the NO2 primary and SO2 primary NAAQS. | |
| Continue to implement SIPs for 1997 PM 2.5 and ozone NAAQS. | | 1997 PM 2.5 and ozone NAAQS being attained statewide. Maintenance Plans in place. | |
| Develop and submit 2006 PM 2.5 NAAQS SIPs. | Due no later than December 2012 | Nonattainment area attaining and redesignation SIP submitted in FY11. | |
| Work with EPA to develop and implement local ozone reduction programs to help achieve attainment of 2011 8-hour ozone NAAQS prior to designations process. | FY12 as resources allow | MDEQ will work with EPA to develop local ozone reduction programs to help achieve attainment of 2011 8-hour ozone NAAQS as resources allow. | |
| Submit SIPs for the §110(a) (2) infrastructure. | Due in October 2011 | PM2.5 infrastructure SIPs submitted in FY11. Lead infra. SIP to be submitted per schedule. | |
| Submit SIPs for the lead NAAQS. | Due January 2013 | Work on SIP for lead NAAQS to proceed in FY12. | |

| | | | |
|---|---|---|---|
| Conduct public notification and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution. | Ozone season forecasting and year around forecasting for PM2.5 | MDEQ will continue to conduct public notification and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution. | |
| Optional:<br>Air Quality Management Plans (AQMPs) for the States of New York and North Carolina, and for the city of St. Louis (Missouri and Illinois) were available in spring 2010 (see www.epa.gov/oar/aqmp).<br><br>States should refer to this information and should begin to integrate activities affecting or affected by air quality (e.g. land use, transportation, energy, climate, environmental justice, and ecosystem impacts) into their planning efforts. | FY12 | MDEQ will consider this information in FY12 planning efforts. | |

| | | | |
|---|---|---|---|
| Consult with EPA as necessary to finalize area designations on revised 2008 ozone and lead NAAQS. | Ozone per impl guide lead Feb 2012 | MDEQ will consult with EPA as necessary to propose area designations on revised 2008 ozone and lead NAAQS. | |
| Outdoor wood boilers and other sources of wood smoke | 9/30/2012 | Work cooperatively with other Region 5 states, LADCO, NESCAUM, and the Michigan Department of Community Health in the investigation of wood smoke in the Upper Midwest. This work will include the conceptual design of a wood smoke particulate monitoring platform. Wood smoke case studies will be conducted in the Midwest. A standard approach will be developed by the collective participants for communities to follow in responding to wood smoke complaints and concerns, including preparing a "toolkit" with basic information and recommended procedures. | |

| **FY 2012 Regional Haze - Attainment Planning and Maintenance** | | | |
|---|---|---|---|
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| Continue to work with EPA, Region 5 on issues related to submitted regional haze SIPs. | FY12 | MDEQ will continue to work with EPA, Region 5 on issues related to submitted regional haze SIP. | |
| Implement BART requirements. | See Lafarge plan sched. | MDEQ will implement BART requirements as applicable. | |
| **FY 2012 - Permitting** | | | |

| Outputs/Measures | Progress Target Dates | State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1) | Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3 |
|---|---|---|---|
| (The following measures are funded with EPA Clean Air Act funding.) | | | |
| Provide timely review of construction permits issued compliant with Greenhouse Gas BACT. | On-going | Continue to provide monthly update to EPA Region 5 permit contact on projects of interest, including PSD, controversial, net-outs, etc. Identify which projects are subject to GHG BACT. | |
| | | | |
| Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RACT/BACT/LAER Clearinghouse (RBLC). | On-going | Assign dedicated AQD staff person the responsibility of RBLC data entry with the goal of 100% of NSR permits requiring entry into the RBLC being entered within 6 months of the permit issuance date. | |
| Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including "the application accepted date" and "the permit issuance date" in to the RBLC national database. | On-going | As stated above, dedicated AQD staff person will enter the data into the RBLC and will include the application accepted date (received date) and the permit issuance date. | |
| | | | |
| Provide PSD/NSR permit applications to EPA prior to the start of the public comment period. | On-going | Monthly statistics provided to EPA Region 5 permit contact regarding projects of interest. The information provided includes the date a copy of the initial permit application was forwarded to EPA as well as the date for commencement of public notice. At the commencement of public notice, a copy of all | |

| | | | |
|---|---|---|---|
| | | relevant information is provided to EPA. | |
| Assist small companies through the Small Business Clean Air Assistance Program. | On-going | Provide information on the permitting process and requirements during pre-application meetings and permit scoping meetings as well as continue to conduct regular training session on the requirements of a properly completed permit application. | |
| | | | |
| **2011-2015 Strategic Measures (Outcomes) - Reduce Air Toxics** | | | |
| By 2015, reduce emissions of air toxics (toxicity-weighted for cancer) to 4.2 million tons from the 1993 toxicity-weighted baseline of 7.2 million tons. | | | |
| **FY 2012 Air Toxics** | | | |
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| **Emission Inventory:** (1) Develop HAP emission inventories for submission to EPA's National Emissions Inventory (NEI) database; (2) submit data for the integrated HAP emissions inventory; (3) Quality assure, validate, and revise NEI data using EIS; and (4) Participate in Regional emission inventory workgroup conference calls. | (1) Submit 2010 inventory data by 12/31/11 | The AQD will submit the year 2010 point source emissions data, including HAPs, in accordance with the requirements contained in the U.S. EPA Air Emissions Reporting Requirements (Title 40 of the Code of Federal Regulations [CFR], §51.1 – 51.45) prior to December 31, 2011. The AQD will continue to devote resources to upgrade the state inventory system to ensure data quality, compatibility with new data formats, and the data reporting requirements identified in 40 CFR, §51.1 – 51.50.<br>As resources allow, the AQD will send representatives to appropriate National Emissions Inventory (NEI) conferences and NEI training sessions or conferences held at the U.S. EPA Region 5 office. The | |

| | | | |
|---|---|---|---|
| | | AQD will continue to support efforts by the U.S. EPA, the Lake Michigan Air Directors Consortium, and others to improve the national ozone modeling inventories for use in attainment demonstrations and will participate in the development of a regional inventory to support the ozone and fine particulate matter (PM-2.5) planning efforts. | |
| Implement delegated or approved section 112, 111 (d) and 129 standards, as appropriate, for major sources residual risk, and area sources. | 9/30/2012<br>9/30/2013 | Administer the Section 112 standards in accordance with the direct final rule approving Michigan's request for delegation under section 112(l) of the Clean Air Act (63 FR 64632, November 23, 1998) and as outlined in the Memorandum of Agreement (MOA) between the U.S. EPA and the MDEQ, signed by David Kee on May 8, 1996, and Dennis Drake on May 16, 1996. Administer area source MACT standards for iron and steel foundries and electric arc furnaces, and aluminum, copper, and other non ferrous foundries. After promulgating rules for these source categories, AQD will seek delegation from EPA. | |
| Perform air toxics risk assessments for NSR permitting. | 9/30/2012<br>9/30/2013 | Develop health risk-based screening levels for toxic air contaminants emitted from all sources subject to the state's air toxics regulations. As needed to address concerns, evaluate non-inhalation pathways of exposure for PBTs and environmental impacts, and cumulative exposures. | |
| Address concerns for ambient air manganese levels in the Detroit area | 9/30/2012<br>9/30/2013 | Complete a report on the air emission sources, monitoring data, health concerns, and recommended steps to further characterize and address elevated ambient air manganese levels | |

| | | | |
|---|---|---|---|
| | | in the Detroit area. | |
| Participate in the quarterly State/Region 5 risk assessment conference calls, and participate in annual State/Region 5 air toxics meeting. | 9/30/2012<br>9/30/2013 | Will participate in all scheduled activities as resources allow. | |
| Review and analyze NATA data, as available. | 9/30/2012<br>9/30/2013 | Will continue to review and analyze the 2005 NATA study results, and utilize the results as needed in NSR to account for background air toxics levels in cumulative exposure and risk assessments. Will evaluate high-risk estimates. | |
| Provide community data analysis and address environmental justice concerns | 9/30/2012<br>9/30/2013 | Work cooperatively with EPA Region 5, ATSDR, the City of Detroit and MDCH to review and interpret air quality information for SW Detroit and to present that information to community members. Provide public participation opportunities when permitting controversial sources in NSR, particularly in EJ areas of concern. | |
| Participate in research projects, policy issues and task forces that address identification and reduction of persistent bio-accumulative air toxic pollutants | Updated QSC State Compendium by 9/30/2012 | Continue to implement the DEQ Mercury Strategy. Participate in State workgroup evaluating perfluorinated compounds (PFCs) in the MI environment. Continue to participate in the Regional GLRC strategy implementation process for the Regional Mercury Emissions Reduction Strategy. Continue to participate in the ECOS-Quicksilver workgroup to coordinate resources on a national basis. | |

| | | | |
|---|---|---|---|
| Mercury reduction efforts | 9/30/2012<br>9/30/2013 | 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. Continue to work with OEA on the GLRI Hg grant to implement the DEQ Mercury Strategy. | |
| Mercury emissions from EGUs | 9/30/2012<br>9/30/2013 | Continue to implement rules restricting mercury emissions from EGUs. | |
| Great Lakes Air Toxics (GLAT) Deposition Program | GLRI Hg grant work must be completed by the end of 2013. | Address the deposition of persistent bioaccumulative toxics (PBTs) in the waterways of the Great Lakes Region. This effort includes, but is not limited to, PBT air monitoring, source characterization, source allocation, and source reduction efforts.<br>Continue to participate with the other Great Lakes states and GLC on implementing efforts identified under the GLAD program.<br>Continue to participate in the GLAD funded "Integrating Multimedia Measurements of Mercury in the Great Lakes Region" project. | |
| TMDLs: Atmospheric sources of mercury and PCBs in Michigan surface waters | 12/31/2012 completion deadline | Develop state-wide mercury and PCB TMDLs by end of 2012 with the assistance of EPA contractors. .FY2012 accomplishments will include mercury emission inventory work, working with U of M on the atmospheric modeling project in support of the TMDL, the review of QAPPs, the development and review of status reports, and participation in meetings/conference calls. | |

| Strategic Goal 5: Enforcing Environmental Laws | | | |
|---|---|---|---|
| **Objective 5.1: Enforcement Environmental Laws. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.** | | | |
| **2011-2015 Strategic Measures (Outcomes) - Maintain Enforcement Presence**[4] | | | |
| By 2015, conduct 105,000 federal inspections and evaluations (5-year cumulative). (FY 2005–2009 baseline: 21,000 annually) | | | |
| By 2015, initiate 19,500 civil judicial and administrative enforcement cases (5-year cumulative). (FY 2005–2009 baseline: 3,900 annually) | | | |
| By 2015, conclude 19,000 civil judicial and administrative enforcement cases (5-year cumulative). (FY 2005–2009 baseline: 3,800 annually) | | | |
| By 2015, maintain review of the overall compliance status of 100 percent of the open consent decrees. (Baseline 2009: 100 percent) | | | |
| By 2015, increase the percentage of criminal cases with charges filed to 45 percent. (FY 2006–2010 baseline: 36 percent) | | | |
| By 2015, maintain an 85 percent conviction rate for criminal defendants. (FY 2006–2010 baseline: 85 percent) | | | |
| By 2015, reduce, treat, or eliminate 2,400 million estimated pounds of air pollutants as a result of concluded enforcement actions (5-year cumulative). (FY 2005–2008 baseline: 480 million pounds, annual average over the period) | | | |
| **Enforcement – FY 2012 Monitoring** | | | |
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| Submit draft Compliance Monitoring Strategy (CMS) plan for review and negotiation with EPA. | July 15, 2011 | The AQD agrees to draft a CMS plan. | |
| Implement the final CMS plan will begin the upcoming federal fiscal year, as it pertains to non-Title V Sources (synthetic minor). The CMS plan should meet EPA's 2010 CAA Stationary Source CMS policy. The CMS source category and frequency flags in AFS will be | October 1, 2011 | The AQD agrees to implement the final CMS plan. | |

| | | | |
|---|---|---|---|
| completed for non-Title V sources universe by October 1, 2011. | | | |
| EPA shall submit written correspondence to MDEQ approving or disapproving the CMS plan submittal. | December 31, 2011 | No commitment is required from MDEQ. | |
| In those years where FCEs are not conducted, PCEs will be completed including review of the various emission reports, as applicable. | Ongoing | The AQD agrees that in those years where FCEs are not conducted, PCEs will be completed including review of the various emission reports, as applicable. | |
| Respond to air pollution complaint including those referred by EPA, as it pertains to non-Title v sources. Inspections will be conducted, as necessary. | Ongoing | The AQD agrees to respond, track and document all air pollution complaints that are received. All violations will be documented and tracked in MACES. | |
| Facilities subject to the asbestos NESHAP regulations will be inspected in accordance with EPA's Implementation Strategy for Revised Asbestos NESHAP guidance, March 31, 1988. | Ongoing | The AQD agrees to conduct 275 inspections, provided staffing is adequate. Facilities to be inspected will be identified through notifications, complaints and other elements of the non-notifier program. The selection of projects to be inspected will be based on a targeting ranking system. | |
| Document each facility (or landfill) inspection. | Ongoing | The AQD agrees to identify violations of the asbestos NESHAP, collect appropriate samples and maintain proper chain-of custody for a period of five years. | |

| | | | |
|---|---|---|---|
| Require the installation, operation and reporting of Continuous Opacity Monitoring Systems (COM) and/or Continuous Emission Monitoring Systems (CEMS) on all sources subject to requirements under State or Federal regulations, as it pertains to non-Title v sources. | Ongoing | The AQD agrees to maintain a database of all sources subject to CEMS requirement in the SIP, NSPS or NESHAP regulations. | |
| Review, track and submit electronically to EPA COMS/CEMS excess emission reports (EERs) that are submitted by subject sources, as it pertains to non-Title V sources. | Quarterly | The AQD agrees to review, track and submit electronically to EPA COMS/CEMS EERs. The EERs will be reviewed for excess emissions and monitor performance. | |
| Track and update EPA on recommendations made during the State Review Framework until completion, as it pertains to non-Title V sources. | Quarterly | The AQD agrees to keep EPA updated on recommendations made during the State Review Framework as it pertains to non-Title V sources. | |
| | | | |
| **Enforcement – FY 2012 Reporting** | | | |
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the sixty (60) day standard required for reporting by the current Air Facility System (AFS) Information Collection | 60 day reporting as required by ICR | The AQD agrees to update report and transfer the MDRs to AFS electronically using the Universal Interface, which will identify all reportable facilities. The MDRs will be uploaded to AFS on a monthly basis. | |

| | | | |
|---|---|---|---|
| Request (ICR), 1998 Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, 1986 Guidance on Federal Reportable Violations (FRVs) for Stationary Sources, as it pertains to non-Title V sources. Ensure data is complete, accurate and timely consistent with EPA policies and ICR, as it pertains to non-Title V sources. Such language should be included in the written agreement between the State and EPA. | | | |
| Provide asbestos NESHAP demolition/renovation notification information, inspections and enforcement activities will be reported. | Quarterly | Within 30 days of the end of each quarter, the AQD agrees to submit a report on disc. | |
| | | | |
| **Enforcement – FY 2012** | | | |
| **Outputs/Measures** | **Progress Target Dates** | **State Commitments - Outputs/Measures and Outcomes – (should relate to the Output/Measure in column 1)** | **Reporting for Final Report or Annual Performance Report of Progress Made in Meeting Commitments (Outputs and/or Outcomes) in columns 1 and 3** |
| EPA and MDEQ will conduct conference calls to discuss efforts to resolve known violators; newly discovered violators identified, case lead, evidence, timeline for resolution and status of case, as it pertains to non-Title V | As scheduled | The MDEQ agrees to conduct conference calls as needed to discuss efforts to resolve issues with violators. MDEQ also agrees to determine with EPA which agency is best suited to take or maintain the lead for HPV cases along with determining what method works best of returning the source back into compliance. | |

| | | | |
|---|---|---|---|
| sources. For State lead HPV cases unaddressed over the 270 day timeframe, EPA and MDEQ will determine which agency is best suited to take or maintain the lead for the case and what will be the best method of returning the source back into compliance. | | | |
| Monthly conference calls will be conducted to discuss data management, reporting and any data related issues, as it pertains to non-Title V sources. | Monthly | The MDEQ agrees to conduct monthly conference calls with EPA. | |
| State will provide to EPA the status code and explanation for HPV sources listed on Headquarters Watch List, as it pertains to non-Title V sources. Case updates will be provided on a monthly basis by MDEQ and entered in the comment field in AFS for State lead HPV cases. EPA will use the updated information in AFS to complete the State lead cases on the Watch List. The Watch List ensures timely and appropriate response to significant non-compliers or longstanding violators through better data analysis and routine discussions between EPA HQs OECA, EPA Region 5 and/or MDEQ. | Quarterly | The MDEQ agrees to provide EPA with status updates of sources placed on the EPA's Watch List. | |
| State will conduct its enforcement activities in | Ongoing | The MDEQ agrees to conduct its enforcement activities in accordance with | |

| | | | |
|---|---|---|---|
| accordance with EPA 1998 Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, 1991 the Clean Air Act Stationary Source Civil Penalty policy and the 1998 Revised Asbestos NESHAP Strategy, as it pertains to non-Title V sources. | | appropriate EPA policies. | |

## BUDGET DETAIL

| Category | Federal | State | Subtotal |
|---|---|---|---|
| ***1. Personnel***<br>Indicate personnel/FTE that will be working on work plan elements. | 2,274,904 | 1,966,155 | 4,241,059 |
| ***2. Fringe Benefits***<br>Indicate the mandated and voluntary benefits to be supplemented with these funds. | 1,401,341 | 1,211,151 | 2,612,492 |
| ***3. Supplies***<br>Indicate any items to be purchased that will be used in support of air project work plan objectives. EPA policy defines supplies as a unit item that cost less than $5,000. | 88,058 | 76,106 | 164,164 |
| ***4. Equipment***<br>Identify items to be purchased such as air quality related instruments used in support of work plan objectives. Provide estimated cost for each item. EPA policy defines equipment as items costing $5,000 or greater. | 99,234 | 85,766 | 185,000 |
| ***5. Contractual***<br>Indicate any proposed contractual items that are reasonable and necessary to carry out the work plan objectives. | 63,027 | 54,473 | 117,500 |
| ***6. Travel***<br>Indicate number of individuals traveling, destination, number of trips, and reason for travel. | 69,211 | 59,817 | 129,028 |
| ***7. Other***<br>Indicate general (miscellaneous) expenses necessary to carry out objectives stated in the work plan. | 412,568 | 356,574 | 769,142 |
| ***8. Total Direct Charges***<br>Summary of all costs associated with each object-class category. | 3,868,910 | 4,476,614 | 8,345,524 |
| ***9. Total Indirect Costs***<br>Organization must provide documentation of a federally approved indirect cost rate (percentage) reflective of proposed project/grant period. | 563,201 | 486,763 | 1,049,964 |
| ***Total Cost***<br>Indicate overall figure of all direct and indirect costs. | 4,971,544 | 4,296,805 | 9,268,349 |