



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



STEVEN E. CHESTER  
DIRECTOR

July 15, 2009

Ms. Sharon Green, Chief  
Assistance Section, Acquisition and Assistance Branch  
United States Environmental Protection Agency  
Region V  
77 West Jackson Boulevard (MC-10J)  
Chicago, Illinois 60604-3590

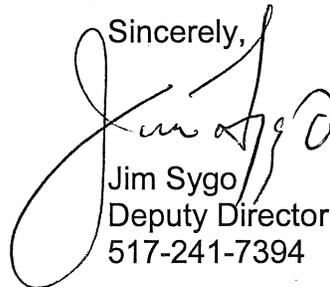
Dear Ms. Green:

Please find enclosed one original and two copies of the grant application for the Fiscal Year 2010 Air Pollution Control Program. This application has been submitted for Executive Order 12372 review. An electronic version of this application will be forwarded to the United States Environmental Protection Agency (U.S. EPA) Project Officer.

If you have any questions relating to the programmatic aspects of this award, please contact Ms. Lisa Root, Administration Section, Air Quality Division, Michigan Department of Environmental Quality (MDEQ), at [rootl@michigan.gov](mailto:rootl@michigan.gov) or at 517-241-2209. Financial questions should be addressed to Ms. Karen Jurgensen, Federal Aid, Financial and Business Services Division, MDEQ, at [jurgensenk@michigan.gov](mailto:jurgensenk@michigan.gov) or at 517-241-7991.

We look forward to working with you on this project.

Sincerely,



Jim Sygo  
Deputy Director  
517-241-7394

Enclosures

cc/enc: Ms. Shari Holloway, U.S. EPA  
Mr. G. Vinson Hellwig, MDEQ  
Ms. Marion Hart, MDEQ  
Ms. Karen Jurgensen, MDEQ  
Ms. Lisa Root, MDEQ  
✓ Ms. Virginia Weiderer, MDEQ

EQ1408 (02/2008)



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



JENNIFER M. GRANHOLM  
GOVERNOR

STEVEN E. CHESTER  
DIRECTOR

August 5, 2008

Ms. Sharon Green, Chief  
Assistance Section, Acquisition and Assistance Branch  
United States Environmental Protection Agency  
Region V  
77 West Jackson Boulevard (MC-10J)  
Chicago, Illinois 60604-3590

Dear Ms. Green:

The Michigan Department of Environmental Quality (MDEQ) requests that the following assurances be placed on file for Fiscal Year 2009 Environmental Protection Agency grants:

- Standard Form LLL-A, "Certification Regarding Lobbying"
- Standard Form 424B, "Assurances - Non-Construction Programs"
- OMB Form 2000-0452, "Procurement System Certification for Superfund"
- EPA Form 4700-4, "Preward Compliance Review Report for all Applications Requesting Federal Assistance"

EPA Form 5700-49, "Certification Regarding Debarment, Suspension, and Other Responsibility Matters," will be signed and submitted with each grant application.

If you have any questions regarding these documents, please contact Ms. Karen Jurgensen, Federal Aid Supervisor, Financial and Business Services Division, MDEQ, at [jurgensk@michigan.gov](mailto:jurgensk@michigan.gov) or at 517-241-7991.

Sincerely,

Steven E. Chester  
Director  
517-373-7917

Enclosures

\_\_\_\_\_  
EPA Project Control Number  
\_\_\_\_\_

United States Environmental Protection Agency  
Washington, DC 20460

**Certification Regarding  
Debarment, Suspension, and Other Responsibility Matters**

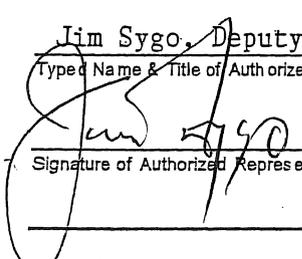
The prospective participant certifies to the best of its knowledge and belief that it and the principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction: violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1) (b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated or cause or default.

I understand that a false statement on this certification may be ground for rejection of this proposal or termination of the award. In addition, under 18 USC Sec. 1001, a false statement may result in a fine of up to \$10,000 or imprisonment for up to 5 years, or both.

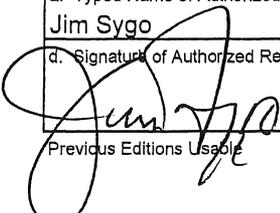
Jim Sygo, Deputy Director

\_\_\_\_\_  
Typed Name & Title of Authorized Representative

 7/15/09  
\_\_\_\_\_  
Signature of Authorized Representative Date

I am unable to certify to the above statements. My explanation is attached.

**APPLICATION FOR  
FEDERAL ASSISTANCE**

2. Date Submitted 7/15/2009		Applicant Identifier D-U-N-S Number 92-932-7880
1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction Preapplication <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		3. Date Received By State State Application Identifier
		4. Date Received By Federal Agency Federal Identifier
5. APPLICANT INFORMATION		
Legal Name MI DEPT. OF ENVIRONMENTAL QUALITY		Organizational Unit
Address (give city, county, state and zip code) P.O. BOX 30473 LANSING, MI 48909 INGHAM COUNTY		Name and Telephone Number of the person to be contacted on matters involving this application (give area code) PROGRAM: Lisa Root, 517-241-2209 FINANCIAL: Karen Jurgensen, 517-241-7991
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 38-6000134		7. TYPE OF APPLICANT: (enter appropriate letter in box) <input checked="" type="checkbox"/> A A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School District I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other - Specify:
8. TYPE OF APPLICATION <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) <input type="checkbox"/> <input type="checkbox"/> A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration E. Other - specify:		9. NAME OF FEDERAL AGENCY U.S. Environmental Protection Agency
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NO.: TITLE: 66-001 Air Pollution Control Program - Section 105		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: FY2010-2011 Air Pollution Control Program
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.) Statewide		
13. PROPOSED PROJECT		14. CONGRESSIONAL DISTRICT OF:
Start Date 10/1/2009	Ending Date 9/30/2011	a. Applicant 8th
		b. Project
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? (check one)
a. Federal	\$4,428,301	<input checked="" type="checkbox"/> YES - THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW. IF YES, PROVIDE DATE OF REVIEW: <u>7/13/2009</u> <input type="checkbox"/> NO - PROGRAM IS NOT COVERED BY EO 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
b. Applicant		
c. State	\$4,814,288	
d. Local		
e. Other- EPA In-kind		
f. Program Income		17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? (check one)
g. TOTAL	\$9,242,589	<input type="checkbox"/> YES (If "YES," attach explanation) <input checked="" type="checkbox"/> NO
18. To the best of my knowledge and belief, all data in this application/preapplication are true and correct. The document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is awarded.		
a. Typed Name of Authorized Representative Jim Sygo		b. Title Deputy Director
		c. Telephone Number 517-241-7394
d. Signature of Authorized Representative 		e. Date Signed 7/15/09

Standard Form 424A

OMB Approval No. 0348-0044

BUDGET INFORMATION - Non-Construction Programs

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Air Pollution Control	66.001			\$4,428,301	\$4,814,288	\$9,242,589
2.						\$0
3.						\$0
4.						\$0
5. TOTALS		\$0	\$0	\$4,428,301	\$4,814,288	\$9,242,589
SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	GRANT PROGRAM FUNCTION OR ACTIVITY				Total (5)	
	(1)	(2)	(3)	(4)		
a. Personnel	\$4,356,105				\$4,356,105	
b. Fringe Benefits	\$2,683,361				\$2,683,361	
c. Travel	\$125,000				\$125,000	
d. Equipment	\$50,500				\$50,500	
e. Supplies	\$162,665				\$162,665	
f. Contractual	\$391,622				\$391,622	
g. Construction	\$0				\$0	
h. Other	\$326,607				\$326,607	
i. Total Direct Changes (sum of 6a-6h)	\$8,095,860		\$0	\$0	\$0	\$8,095,860
j. Indirect Charges	\$1,146,729					\$1,146,729
k. TOTALS (sum of 6i and 6j)	\$9,242,589		\$0	\$0	\$0	\$9,242,589
7. Program Income						\$0

**STANDARD FORM 424A (cont'd.)**

SECTION C - NON-FEDERAL RESOURCES						
	(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8.	Air Pollution Control		\$4,814,288		\$4,814,288	
9.					\$0	
10.					\$0	
11.					\$0	
12.	TOTAL (Sum of Lines 8 - 11)	\$0	\$4,814,288	\$0	\$4,814,288	
SECTION D - FORECASTED CASH NEEDS						
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	
13.	Federal	\$4,428,301	\$1,107,076	\$1,107,075	\$1,107,075	\$1,107,075
14.	Non-Federal	\$4,814,288	\$1,203,572	\$1,203,572	\$1,203,572	\$1,203,572
15.	TOTAL (sum of lines 13 and 14)	\$9,242,589	\$2,310,648	\$2,310,647	\$2,310,647	\$2,310,647
SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT						
	(a) Grant Program	FUTURE FUNDING PERIODS (Years)				
		(b) First	(c) Second	(d) Third	(e) Fourth	
16.						
17.						
18.						
19.						
20.	TOTAL (sum of lines 16 - 19)	\$0	\$0	\$0	\$0	
SECTION F - OTHER BUDGET INFORMATION						
21. Direct Charges:		22. Indirect Charges:				
23. Remarks:						

Michigan Department Of Environmental Quality  
Air Pollution Control Program  
CEL Worksheet

A005711

A005711	FY 2008 Equipment List	(Actual)	FY 2009 Equipment List	(Actual)	FY 2010 Equipment List	(Estimated)
<b>PART I</b>	Trace Level SO2 Analyzer	10,601	Trace Level CO Analyzer	11,037	(2) URG 3000N Monitor	22,000
Nonrecurrent Equipment Expenditures (\$5,000 & over per unit order)					(2) API 4003 Ozone Monitor	20,000
					(1) Data Logger	8,500
Total Nonrecurrent Equipment Expenditures		\$ 10,601		\$ 11,037		\$ 50,500
Other Nonrecurrent Expenditures	Site upgrades	\$ 13,100	In-kind	\$ 200,000	In-kind	\$ -
<b>PART II</b>						
Total Nonrecurrent Expenditures		\$ 23,701		\$ 211,037		\$ 50,500
Non-Federal Sharing Ratio		54.26%		54.54%		52.09%
Non-Federal Nonrecurrent Expenditures		\$ 12,860		\$ 115,100		\$ 26,305
<b>PART III</b>						
Total Program Expenditures		\$8,847,946		\$8,989,987		\$9,242,589
Non-Federal Sharing Ratio		54.26%		54.54%		52.09%
Total Non-Federal Expenditures		\$ 4,800,843		\$ 4,903,083		\$ 4,814,288
Less: Non-Federal / Nonrecurrent Expenditures		\$ (12,860)		\$ (115,100)		\$ (26,305)
Continuing Eligibility Level (Non-Federal / Nonrecurrent)		\$ 4,787,983		\$ 4,787,983		\$ 4,787,983

**DEPARTMENT OF ENVIRONMENTAL QUALITY - AIR QUALITY DIVISION  
FISCAL YEAR 2010 PROGRAM COSTS ESTIMATE**

**MICHIGAN AIR POLLUTION CONTROL PROGRAM**

7/8/2009

**PERSONNEL**

This program consists of 79 work-years of effort.  
Costs are based on actual projected salaries for the year. \$4,356,105

**FRINGES**

Fringe benefits include insurances average cost (25%) and retirement costs (35%) of salaries. Terminal-leave average costs (1%) of salaries, fringe benefits and retirement. Costs are based on actual projected fringes for the year. \$2,683,361

**TRAVEL**

Travel costs are based upon last year's costs. 125,000

**EQUIPMENT**

List attached in PPA-5. 50,500

**SUPPLIES**

Misc Replacement Parts and Site Upgrades Supplies 102,665  
Misc Office and Operational Supplies 60,000

**CONTRACTUAL**

Attorney General estimated costs in PPA 4-6 140,000  
Lab services estimated costs in PPA 12 130,000  
City of Grand Rapids contract 105,122  
Sonoma web site annual service contract 10,000  
ESC annual service contract 5,000  
Monitoring Site Mowing and Snow removal Contracts 1,500

**OTHER**

\$35,028 Telephone and Utility expenses 35,028  
\$10,000 for State audit costs relating to OMB Circular A-128 10,000  
\$281,579 for Information Technology Services (DIT) 281,579

**PROGRAM INCOME**

0

**INDIRECT**

Indirect costs are estimated to be 16.61% of salary and fringe expenses. Final approved rate with EPA. 1,146,729

**GRAND TOTAL** **\$9,242,589**

Calculating the  
40% Matching Requirement and the  
Maintenance of Effort/Continuing Eligibility Level (MOE/CEL)  
for a Section 105 Categorical Cooperative Agreement Air Grant

40% Match Calculation

1. From the Performance Partnership Agreement, grant application, work plan, or Final Financial Status Report, write down the total projected/expended air program costs. \$9,242,589
2. Write down the total amount of Federal Section 105 grant funds being awarded, including the "in-kind" amounts. \$4,428,301
3. Subtract the amount in step 2 from that in 1 to get the Grantee (or non Federal) funded portion of the total air program costs. \$4,814,288
4. Divide the non Federal contribution in step 3 by the total air costs in 1 to get the Grantee's actual matching share ratio for its projected air program. 52.09%
5. If the sharing ratio in step 4 is less than 0.40, the Grantee has not met the minimum 40% non Federal matching requirement. The Grantee must either increase its contributions and/or the Federal amount must be reduced, or some combination thereof must occur. Once the minimum 40% share ratio is met, recalculate from step 1.

MOE/CEL Calculation

6. Take all non recurrent costs (including "in-kind" amounts) in the program and add them up. All expenditures are considered to be recurrent unless justified by the recipient to be non recurrent. Non recurrent expenditures are now defined as those expenditures which are shown by the recipient to be of a non repetitive, unusual, or singular nature that would not reasonably be expected to recur in the foreseeable future. Costs categorized as non recurrent must be approved by EPA as part of the grant agreement, work plan or an amendment thereto. \$ 50,500
7. Multiply the total amount of non-recurrent expenditures in step 6 by the sharing ratio in step 4 to get the Grantee's share of the total non recurrent cost. \$ 26,305

8. Subtract the Grantee's share of non recurrent expenditures in step 7 from its total expenditures in 3 to get the Grantee's air recurrent cost, i.e., MOE/CEL. \$4,787,983

Calculate the previous MOE/CEL recurrent costs from either the final FSR from the second to last fiscal year or, preferably and if available, the most

9. recent previous fiscal year final FSR. The MOE/CEL dollar amount for the current/prospective grant in step 8 must be equal to or greater than the previous fiscal years' MOE/CEL dollar amounts. \$4,787,983

10. The MOE/CEL dollar amount must be recalculated each time the air funds portion of the grant is amended fiscally and when the final FSR is submitted. Each MOE/CEL dollar amount then should be compared to the previous, most recent fiscal year MOE/CEL levels, calculated comparably, to assure that MOE/CEL continues to be met. If not met, the Grantee must increase its non Federal contributions, switch its program activities from non recurrent to recurrent outputs, and/or decrease the Federal funds received until the MOE/CEL level is met. If failure to meet the MOE/CEL level is due to a non selective reduction in all of the Executive Agencies' budgets, a new, lower CEL/MOE may be established.

**Travel Detail FY 2010  
EPA GRANT 105**

**EPA GRANT 105**

<b>Description</b>	<b>Amount</b>
<b><u>In State Travel:</u></b>	
In State Vehicle Usage (Charges for use of State Vehicles)	53,172
In State Mileage Reimbursement (See Attachment 1)	38,860
In State Meals Reimbursement (See Attachment 1)	3,654
In State Lodging (See Attachment 1)	2,400
<b>Total In State</b>	<u><u>98,086</u></u>
<b><u>Out of State Travel:</u></b>	
Out of State Vehicle Usage (See Attachment 2)	4,183
Air Fare Out of State (See Attachment 2)	6,175
Meals Out of State (See Attachment 2)	5,627
Lodging Out of State (See Attachment 2)	9,230
Other Misc. Out of State Expenses (See Attachment 2)	1,698
<b>Total Out of State</b>	<u><u>26,914</u></u>
<b>Total Estimated Fiscal Year 2010 Travel Expenses</b>	<u><u>125,000</u></u>

## Attachment 1

## Air Monitoring

Site Name	Number of FTE's	From	To Site Address	Mileage round trip	Estimated trips FY10	Standard Mileage Rate (.328 per Mile)	Estimated Hotel Cost FY10	Estimated Meal Costs FY10	Reasons for Trip
Franfort/Benzie	1	Lansing	1088 West St.	416	36	4,912	\$800	\$261	Sample Setup, Audits or Repairing Equipment
Scottville	1	Lansing	525 W. US-10	330	36	3,897	\$400	\$261	Sample Setup, Audits or Repairing Equipment
Houghton Lake	1	Lansing	1769 S. Jeffs Road	256	36	3,023	\$400	\$261	Sample Setup, Audits or Repairing Equipment
Kalamazoo Fairgrounds	1	Lansing	1400 Olmstead Road Whaley Park, 3610 Iowa St. &	144	36	1,700	\$0	\$261	Sample Setup, Audits or Repairing Equipment
Flint / Otisville	1	Lansing	G11107 Washburn Road	175	36	2,066	\$0	\$261	Sample Setup, Audits or Repairing Equipment
Lansing	1	Lansing	220 N. Pennsylvania	4	36	47	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Rose Lake	1	Lansing	8562 E. Stoll Road	36	36	425	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Cassopolis	1	Lansing	22721 Dimondcove Road	238	36	2,810	\$0	\$261	Sample Setup, Audits or Repairing Equipment
Grand Rapids	1	Lansing	1179 Monroe St., NW	138	36	1,630	\$0	\$261	Sample Setup, Audits or Repairing Equipment
Evans	1	Lansing	10300 14 Mile Rd, Ne #B	156	36	1,842	\$0	\$261	Sample Setup, Audits or Repairing Equipment
Muskegon, Green Creek	1	Lansing	1340 Green Creek Road	226	36	2,669	\$400	\$261	Sample Setup, Audits or Repairing Equipment
Jenison	1	Lansing	Georgetown Twp.	108	36	1,275	\$0	\$261	Sample Setup, Audits or Repairing Equipment
Harbor Beach	1	Detroit	1172 S. M-25, Sand Beach Twp.	330	36	3,897	\$400	\$261	Sample Setup, Audits or Repairing Equipment
New Haven	1	Detroit	57700 Gratiot	68	36	803	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Warren	1	Detroit	29900 Hoover	32	36	378	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Port Huron	1	Detroit	2525 Dove Road	114	36	1,346	\$0	\$261	Sample Setup, Audits or Repairing Equipment
E. Seven Mile Road	1	Detroit	11600 E. Seven Mile Road	16	36	189	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Tecumseh	1	Detroit	6792 Raisin Center Hwy.	120	36	1,417	\$0	\$261	Sample Setup, Audits or Repairing Equipment
River Rouge	1	Detroit	315 Genesee	24	36	283	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Livonia	1	Detroit	38707 Seven Mile Road	50	36	590	\$0	\$0	Sample Setup, Audits or Repairing Equipment
W. Jefferson	1	Detroit	7701 W. Jefferson	16	36	189	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Newberry School	1	Detroit		50	36	590	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Oak Park	1	Detroit	13701 Oak Park Blvd.	26	36	307	\$0	\$0	Sample Setup, Audits or Repairing Equipment
W. Fort St.	1	Detroit	6921 W. Fort St.	14	36	165	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Dearborn	1	Detroit	2842 Wyoming	14	36	165	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Ypsilanti	1	Detroit	555 Towner St.	68	36	803	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Allen Park	1	Detroit	14700 Goddard	30	36	354	\$0	\$0	Sample Setup, Audits or Repairing Equipment
Lansing Office	1	Detroit	525 W. Allegan Street	92	36	1,086	\$0	\$261	Trips in to Main Office
				<b>3291</b>	<b>1008</b>	<b>\$38,860</b>	<b>\$2,400</b>	<b>\$3,654</b>	

## Attachment 2

Number of FTE's	Event/Conference/Training	Location	Month	Total Estimated							Total Est. Cost
				Cost of Trip	Travel	Air Fare	Lodging	Meals	Other Exp.		
1	ASTM Committee Meeting	Washington D.C.	Oct, 08	680.00	247.00	0.00	273.00	119.00	45.00	684.00	
1	Air & Waste Management Association Meeting	Oak Brook, IL	Oct, 08	366.31	0.00	152.18	200.00	44.00	0.00	396.18	
1	State & Territorial Air Pollution Program Administrators Mtg.	Coeur d'Alene, ID	Oct, 08	1,380.00	0.00	680.00	450.00	200.00	50.00	1,380.00	
2	Midwest RPO Project Team Meeting	Chicago, IL	Nov, 08	337.00	132.50	0.00	100.00	100.00	500.00	832.50	
1	Midwest RPO Photochemical Modeling Conference	Des Plaines, IL	Nov, 08	554.90	170.00	0.00	200.00	150.00	34.90	554.90	
1	Air Researchers Meeting	Windsor, Canada	Nov, 08	199.58	80.00	0.00	69.58	40.00	10.00	199.58	
1	Regional Air Quality Workshop/Global Warming Conference	Chicago, IL	Nov, 08	686.00	226.00	0.00	250.00	150.00	60.00	686.00	
4	Regional Air Quality Workshop	Rosemont, IL	Nov, 08	218.00	130.00	0.00	0.00	88.00	0.00	218.00	
1	Regional Toxic Inventory Steering Committee Meeting	Chicago, IL	Nov, 08	472.50	132.50	0.00	200.00	100.00	40.00	472.50	
2	Mercury Workshop	Portage, IN	Nov, 08	173.22	99.00	0.00	0.00	74.22	0.00	173.22	
2	Great Lakes Binational Toxics Strategy Meeting	Chicago, IL	Nov, 08	582.74	347.19	0.00	160.00	66.00	17.00	590.19	
1	ASTM Committee Meeting	Madison, WVN	Nov, 08	479.46	0.00	207.62	180.00	92.50	0.00	480.12	
3	EPA Settlement Conference	Chicago, IL	Dec, 08	622.50	132.50	0.00	250.00	200.00	40.00	622.50	
1	EPA Training	Little Rock, AR	Dec, 08	1,156.45	0.00	526.45	385.00	200.00	45.00	1,156.45	
1	STAPPA Conference & EPA Workshop	Albuquerque, NM	Dec, 08	790.00	0.00	365.00	300.00	125.00	0.00	790.00	
1	Region V Environmental Commissioners Meeting	Chicago, IL	Jan, 09	118.00	78.00	0.00	0.00	30.00	10.00	118.00	
1	State & Territorial Air Pollution Program Administrators Mtg.	Clearwater, FL	Jan, 09	709.20	0.00	384.20	200.00	100.00	25.00	709.20	
2	Midwest RPO Project Team Meeting	Chicago, IL	Feb, 09	282.00	132.50	0.00	68.00	71.50	10.00	282.00	
1	Windsor Air Quality Symposium	Windsor, Canada	Mar, 09	183.84	0.00	0.00	105.00	65.60	13.20	183.80	
4	Regional Air Quality Workshop	Chicago, IL	Mar, 09	443.50	132.50	0.00	200.00	110.00	1.00	443.50	
1	Regional Toxic Inventory Steering Committee Meeting	Chicago, IL	Mar, 09	447.50	132.50	0.00	200.00	125.00	20.00	477.50	
2	Visible Emissions Training	Green Bay, WI	Mar, 09	337.06	132.00	0.00	135.00	65.75	5.00	337.75	
2	2008 EPA Air Toxics Conference	RTP, NC	Mar, 09	1,315.98	0.00	760.80	441.18	114.00		1,315.98	
1	PEER Workshop	Cincinnati, OH	Mar, 09	535.27	0.00	331.79	105.00	51.39	49.86	538.04	
1	Canadian National Emissions Processing	Ottawa, Ontario, Canada	May, 09	820.00	250.00	0.00	300.00	250.00	20.00	820.00	
1	LADCO Data Analysis	Chicago, IL	May, 09	452.50	132.50	0.00	130.00	150.00	40.00	452.50	
2	2008 Asbestos Regional Meeting	Chicago, IL	May, 09	558.50	132.50	0.00	150.00	220.00	56.00	558.50	
2	LADCO	Chicago, IL	May, 09	536.90	132.50	0.00	200.00	150.00	54.40	536.90	
1	State & Territorial Air Pollution Program Administrators Mtg.	Madison, WVN	May, 09	475.00	125.00	0.00	200.00	150.00		475.00	
1	Depositions	FI	June, 09	757.40	0.00	567.40	130.00	60.00	0.00	757.40	
1	Workshop Env Info	Chicago, IL	June, 09	322.50	132.50	0.00	100.00	50.00	40.00	322.50	
2	EPA Air Toxics Risk Assessment Information Exchange	Chicago, IL	June, 09	481.55	226.00	0.00	119.00	111.25	25.30	481.55	
2	STAPPA Enforcement and Compliance Workshop	Charleston, SC	June, 09	1,132.33	0.00	621.58	330.75	125.00	55.00	1,132.33	
1	EPA National Air Quality System Annual Conference	San Diego, CA	June, 09	1,478.99	0.00	489.79	700.00	264.00	28.00	1,481.79	
2	Air & Waste Management Annual Conference	Minneapolis, MN	June, 09	1,337.21	0.00	347.75	610.00	281.00	98.50	1,337.25	
4	Regional Air Quality Workshop	Chicago, IL	June, 09	453.75	180.00	0.00	100.00	133.75	40.00	453.75	
1	EPA Region V Risk Communications Seminar	Chicago, IL	July, 09	660.18	132.50	0.00	288.00	200.00	40.00	660.50	
1	EPA Training/Office of Transportation and Air Quality	Indianapolis, IN	July, 09	502.00	77.00	0.00	200.00	200.00	25.00	502.00	
1	American Society for Testing and Materials Meeting	Manchester, NH	August, 09	550.00	0.00	250.00	200.00	100.00	0.00	550.00	
1	Great Lakes Toxic Air Emissions Inventory Committee	Chicago, IL	August, 09	482.50	132.50	0.00	200.00	100.00	50.00	482.50	
2	Air Innovations Conference	Chicago, IL	August, 09	1,001.00	226.00	0.00	400.00	300.00	75.00	1,001.00	
2	Power Plant Air Pollutant Control Symposium	Washington, DC	August, 09	1,265.72	0.00	490.72	400.00	300.00	75.00	1,265.72	
<b>Total</b>					<b>\$4,183.19</b>	<b>\$6,175.28</b>	<b>\$9,229.51</b>	<b>\$5,626.96</b>	<b>1,698.16</b>	<b>26,913.10</b>	

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for  
planning purposes only and not subject to audit.)

Date: July 1, 2009

Program: Air Management

Item: PPA-1

PPA Title: Administrative Requirements

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): G. Vinson Hellwig

A. Key responsible person(s): G. Vinson  
Hellwig

B. Key responsible group: Administration

B. Key responsible group: Administration

C. **FY 2009-2010 Commitment Narrative:**

**Priorities for PPA-1 and all following PPA's:** The Air Quality Division (AQD) commits to continue its efforts, to the extent resources allow, to improve and protect the air, making it healthier to breathe, and decreasing the risks to human health and the environment. Our goals are to meet and maintain federal and state air quality standards, limiting emissions of hazardous and toxic pollutants, using the best available technology and cost effective controls, and keep the public informed about air quality conditions. Identify and reduce existing outdoor air pollution problems and prevent significant deterioration of the air resource. This includes air emission control programs, air monitoring, control strategy planning, partnerships to promote voluntary reductions, issuance of permits, and inspection of air emission sources.

The city of Grand Rapids contract for FY 2009 was approved by the State Advisory Board in September, 2008. Coordination of the Air Monitoring Program continues. Audits have been conducted in a timely manner and will continue to occur. The FY 2010 contract is expected as soon as possible after October 1, 2009.

The AQD has in place policies and standard operating procedures in order to manage the grant funds associated with completing the work plan components outlined in this and the following PPAs for the FY 2010 application.

The final report will be submitted in the format requested by the U.S. EPA.

**Work Plan Negotiations/Annual Meeting:** The AQD met with the U.S. EPA on May 28, 2009 to discuss Air Program issues.

The AQD commits to work with the U.S. EPA to negotiate the annual cooperative agreement and amendments. It must be recognized that the U.S. EPA must provide timely guidance to allow the AQD to meet established deadlines, and in the event that this timely guidance is not provided, reasonable deadlines will be established for the AQD to meet.

The AQD intends to continue having a Senior Environmental Employee (SEE) Program position in the program for FY 2010. The SEE position will work with the AQD staff at our Lansing Filley Street facility doing maintenance services.

**Climate Change** – To the extent resources allow, MDEQ and Region 5 will coordinate on climate change issues and work to support efforts on GHG reductions.

**Quality Assurance Management Plan (QMP):** The MDEQ will follow its updated QMP submitted to EPA on July 16, 2008. The QMP documents how the MDEQ will comply with the provisions outlined therein.

**Performance Evaluation Process and Reporting Schedules:** In accordance with Title 40 of the Code of Federal Regulations (CFR), §35.107, AQD agrees to include in the work plan a performance evaluation process and reporting schedule in accordance with §35.115. The AQD agrees to submit an end-of-year progress report within 90 days of the end of the reporting period and a final report within 90 days after the project period has ended.

**Minority Business Enterprise, Women’s Business Enterprise, And Equal Employment Opportunity:** The AQD commits to continuing implementation of this effort. Assistance has been discussed with the U.S. EPA, Region 5 to insure that all opportunities are taken.

**Public Information:** The AQD plans to continue to provide opportunities for public involvement in the Michigan Air Pollution Control Program through a number of different avenues, as resources allow. Public meetings, public listening sessions, public hearings, public notices in newspapers, presentations, routine verbal communications, as well as written communications are all parts of the on-going public involvement in the state air program.

Informational material that allows the general public and industry to make informed decisions related to ambient air quality issues will continue to be developed and updated, again, as resources allow. A heavy emphasis on web-based outreach will continue to maintain current information and to save money by reducing the volume of printed material.

Automated outreach will continue to be provided through “EnviroFlash” - a joint MDEQ and U.S. EPA program that serves residents living in 12 Michigan regions including the seven urban MSAs where AQI reporting is required by federal law. AQI forecast notifications [*including “Action! Day” messages when predicted*] are sent via e-mail or cell phone texts to all who are enrolled at the health level they choose. A link located on the MDEQ internet webpage serves as the portal for this service.

Partnership programs will continue to be utilized as a highly effective method of communication in the area of voluntary pollution reduction.

**Safety/Training:** The AQD plans to continue to provide required safety training and career development for all employees, as funding allows.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program Category: Air Management

Item: PPA-2

PPA Title: Attainment and Maintenance Planning and Implementation

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person: Robert Irvine

A. Key responsible person: Robert Irvine

B. Key responsible group(s): Strategy Development  
Unit and Emission, Reporting and Assessment  
Unit

B. Key responsible group(s): Strategy  
Development Unit and Emission,  
Reporting and Assessment Unit

**C. FY 2009-2010 Commitment Narrative:**

1. Ozone SIP

For the 1997 ozone NAAQS, the AQD will implement the maintenance area commitments in all 24 counties that have been re-designated to attainment. For Allegan County, the AQD will continue to monitor EPA's actions to revise the implementation rule that was remanded and will develop appropriate SIP materials after a new implementation rule is finalized.

The AQD will continue to participate in the LADCO ozone related SIP modeling and control strategy planning for the 2008 8-hour ozone standard in Michigan and in the rest of the LADCO region.

The AQD will continue to evaluate appropriate nonattainment designations for the 2008 ozone standard as new air monitoring data becomes available and will recommend revised designations to the U.S. EPA as appropriate.

The AQD will continue to implement SIP requirements for ozone nonattainment and maintenance areas regarding monitoring (see PPA-5) and development of periodic emission inventories (see PPA-6). The AQD will implement control measures in maintenance areas, if necessary.

The AQD will implement our CAIR NOx and SO2 program, making necessary modifications after EPA revises CAIR in response to the court's remand.

The AQD will continue to participate in and provide technical support for Ozone Action voluntary emission reduction programs as resources allow. The AQD will continue to pursue implementation of pollution prevention in its programs.

The AQD will participate in the Conformity Interagency Workgroup meetings and review conformity analyses as necessary.

## 2. Rules

The AQD will continue to assist in necessary rulemaking, including changes to permit rules, open burning rules, landfill and combustor rules, and MACT rules.

## 3. PM-2.5 SIP

Concerning the 1997 PM-2.5 NAAQS, the AQD will evaluate expected comments on the SIP submitted to EPA and make appropriate changes. The AQD will continue working with the U.S. EPA, LADCO, and SEMOS in researching the PM2.5 problem in southeast Michigan. Following EPA's finalization of designations for the 2006 PM-2.5 NAAQS, the AQD will begin work to develop a SIP for the 24 hour standard.

## 4. PM-10 SIP

The AQD will continue to implement the PM-10 maintenance plan and initiate contingency measures, if required.

## 5. Regional Haze

The AQD will complete work with BART subject facilities in developing acceptable control plans and will submit an updated regional haze SIP to the U.S. EPA. The AQD will continue to participate in planning and technical activities for addressing the Regional Haze Program through the LADCO as resources are made available.

## 6. Lead

The AQD will make recommendations for designations for the 2008 lead NAAQS.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Air Management

Item: PPA-3

PPA Title: Air Toxics

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key Responsible Person: Robert Sills

A. Key Responsible Person: Robert Sills

B. Key Responsible Group: Toxics Unit

B. Key Responsible Group: Toxics Unit

**C. FY 2010 Commitment Narratives, as resources allow:**

The Air Quality Division (AQD) will administer 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.

The AQD will develop health risk-based screening levels for toxic air contaminants emitted from all sources subject to the state's air toxics regulations. These screening levels will be used to ensure emissions of toxic air contaminants from these sources do not adversely affect human health. Further risk assessment work will be done for sources which pose a potential concern for air toxics other than via direct inhalation exposure, which are subject to the state's air toxics regulations. Those additional impacts which may be assessed include multipathway exposures, cumulative exposures, interactive effects, and ecological impacts.

General

The AQD will participate in the quarterly State/Region 5 risk assessment conference calls. The AQD will participate in annual State/Region 5 air toxics meetings as resources allow.

Community Based Risk Assessments and Voluntary Programs

As resources allow, the AQD will continue efforts to reduce the risks from air toxics in the Detroit area, targeting pollutants of highest priority identified through the Detroit Air Toxics Initiative (DATI). As part of this process, the AQD has been developing an assessment of manganese emission sources and ambient air impacts in the Detroit area and will continue the investigation of source emissions and corresponding trends in ambient manganese levels.

The AQD will continue to participate in the development and implementation of comprehensive multi-stakeholder air toxics reduction efforts, as resources allow, including:

- participation in the Greater Grand Rapids Children's Environmental Health Initiative;
- engage in work under the Community Data Analysis project which will follow up risk assessment and risk communication from analysis of monitored data 5 years post-DATI;

- participate in the Michigan Clean Diesel Initiative and the Asthma Initiative of Michigan (AIM), to reduce children's exposures to diesel exhaust in indoor and outdoor air, especially in school settings.

The AQD will participate in indoor air quality issues, as resources allow, by emphasizing activities that contribute to reducing asthma attacks in areas that are experiencing disproportionate impacts through participation in AIM.

National-Scale Air Toxics Assessment NATA

The AQD will review and evaluate the findings of the EPA NATA 2002 assessment, as resources allow, and will utilize the results as needed in New Source Review to account for potential background levels in cumulative risk assessments.

EPA Schools Air Toxics Monitoring initiative

The AQD will provide assistance to EPA as needed, regarding the review, interpretation, and risk communication of the air toxics monitoring results for the two Michigan schools included in this EPA initiative.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Compliance Program

Item: PPA-4-1

PPA Title: Inventory and Reporting

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): Gerald Avery and  
Karen Kajiya-Mills

A. Key responsible person(s): Gerald  
Avery and Karen Kajiya-Mills

B. Key responsible group: Field Operations  
Section and Technical Programs Unit

B. Key responsible group: Field  
Operations Section and Technical  
Programs Unit

**C. FY 2009- FY 2010 Commitment Narrative:**

**For non-Title V sources, the Air Quality Division (AQD) will, to the extent resources allow:**

**1.0 Maintain Inventory of Sources Subject to Federal Regulations**

The AQD commits to maintain an up-to-date inventory for sources including New Source Performance Standards (NSPS), non-transitory National Emission Standards for Hazardous Air Pollutants (NESHAP) sources (including sources subject to promulgated Maximum Achievable Control Technology [MACT] standards as notification is provided or through inspections that identify MACT applicability), and sources avoiding New Source Review (NSR)/Prevention of Significant Deterioration (PSD) review through permit restrictions (synthetic minor).

**2.0 Compliance Monitoring Strategy & Reporting**

The Michigan Air Compliance and Enforcement System (MACES) is operational and being used by staff. The web-based MACES database is compatible with Facility Profiler. Every 60 days the MDEQ will update, report and transfer the minimum data requirements (MDR) to the U.S. EPA which will identify all NSPS, non-transitory NESHAP, and synthetic minor sources. The MDRs will be uploaded to AFS electronically using the Universal Interface. The data will include the following information:

- a) Identification of all NSPS, non-transitory NESHAP (including MACT facilities) and synthetic minor sources, added to the inventory of sources including, but not limited to the Facility name and address; the AQD registration number; standard industrial classification, NAICS and/or Government facility code; the NESHAP subpart(s) to which the Facility is subject; operating status; pollutant, classification, attainment and compliance status; the annual compliance certifications received and reviewed.

- b) The compliance status of all NSPS and non-transitory NESHAP facilities. This shall include all revisions in compliance status since the last report, such as: violations observed, required facility reporting that is delinquent or missing, continuous emission monitoring system violations, newly discovered sources that have avoided NSR/PSD review, violations of the AQD enforcement settlements resolving High Priority Violations (HPV\*), and past violations that was resolved during the quarter.
- c) The dates of the full compliance and partial compliance evaluations that included an on-site inspection conducted on NSPS and non-transitory NESHAP facilities during the reporting period.
- d) Identification of sources for which NESHAP and MACT waiver requests have been received during the period and the status of action on such requests.

### 3.0 Reports as Needed

- 3.1 The AQD will continue to provide copies of final compliance orders and consent decrees after final signatures are obtained.
- 3.2 The AQD commits to provide documentation on individual NSPS, and non-transitory NESHAP violations within 30 days of the U.S. EPA's request. The AQD commits to submit inspection reports to the U.S. EPA upon request.
- 3.3 HPVs\* will be identified in monthly conference calls. See PPA 4-3.

Notes: [\*] High Priority Violations are as defined in the HPV/T&A Guidance, dated December 22, 1998.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Compliance Program

Item: PPA-4-2

PPA Title: Compliance Assessment

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

- A. Key responsible person(s): Gerald Avery and  
Karen Kajiya-Mills
- B. Key responsible group: Field Operations  
Operations Section and Technical Programs Unit

- A. Key responsible person(s): Gerald  
Avery and Karen Kajiya-Mills
- B. Key responsible group: Field  
Operations Section and Technical  
Programs Unit

**C. FY 2009-2010 Commitment Narrative:**

**For non -Title V sources, the state will, to the extent resources allow:**

- 1.0 State Implementation Plan, New Source Performance Standards, Non-transitory National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology, and Minor Source Inspections
  - 1.1 The Air Quality Division (AQD) commits to conduct at least a partial compliance evaluation that includes an onsite inspection for the more significant processes at non-Title V sources selected using the Compliance Monitoring Strategy (CMS) for stationary source inspections.
  - 1.2 Staff continues to inspect all dry cleaning establishments for compliance with state rules and the perchloroethylene NESHAP. The inspectors are working with staff of the Environmental Science and Services Division on an Environmental Results Program for the dry cleaners. This is a three year project designed to improve compliance through self evaluations and self certifications. This paragraph is informational only since these activities are not part of this grant.
  - 1.3 After each inspection, a report will be prepared on the results of the inspection, including an identification of the process(es) that was (were) found to be in violation, the process and emission data that were recorded or calculated which document the violation(s), and a statement of the applicable regulation(s) being violated.
  - 1.4 The AQD will work with the Region and perform field investigations for regional enforcement initiatives for sources targeted for inspection.

## 2.0 Permit Evaluations and Inspections

The AQD will conduct an appropriate evaluation of site acceptability for applications for permits to install only for the new Greenfield type sources that are the object of substantial public concern and have a very significant potential to cause adverse impacts on the neighboring public. Such evaluations are to include a determination on the acceptability of the proposed source with regard to its impact on the surrounding environment, and may include a determination of compliance with local zoning, if the AQD has reason to believe that local zoning may be a problem. The evaluation will be documented only if the site is determined to be unacceptable.

## 3.0 Complaint Investigation and Response

- 3.1 The AQD will enter into a computerized data system all air pollution complaints that are received including the complainant's name, nature of the complaint, any information that could identify the source of any emissions, and the response efforts of the AQD.
- 3.2 The AQD will evaluate all priority I and II complaints received for appropriate resolution method, and refer those complaints that can and should be addressed by another agency (local zoning or building department, local health department, or other county or state agency). The AQD will investigate all priority I and II complaints not referred to other agencies, using established priorities and procedures.
- 3.3 The AQD will document all violations, which are identified as a result of complaint investigations as resources allow.

## 4.0 Record Review and Documentation

- 4.1 The AQD commits to review and document the review of appropriate production records, reports, and program plans as required by the EPA regulations delegated to the AQD. The AQD will determine compliance with applicable regulations as to the timeliness and content of the submittal.
- 4.2 The AQD commits to document when company reported data regarding process operation, monitor operation, and/or emission data show violations. Permit conditions will be maintained in the inspection file.
- 4.3 The AQD commits to process compliance waiver applications where allowed by the NESHAP and MACT regulations, and monitor compliance waiver milestones.
- 4.4 The state commits to determine if NSPS sources have been tested in accordance with Title 40 of the Code of Federal Regulations, Part 60.

## 5.0 Senior Environmental Employee (SEE) Program Positions

- 5.1 Presently there is one part-time SEE position in the field, which conducts compliance and enforcement activities related to the air quality program. They also extract and compile data for compliance evaluations and respond to air pollution complaints.

## 6.0 Miscellaneous

- 6.1 Due to resource limitations, the AQD is unable to commit to implementing the CFC and halon-recycling provisions of the federal Clean Air Act Amendments, nor to conducting related source inspections. Specific commitments may be made in the event federal funding and/or federal assignee staff is provided.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Compliance Program

Item: PPA-4-3

PPA Title: Escalated Enforcement

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): Tom Hess

A. Key responsible person(s): Tom Hess

B. Key responsible group: Enforcement

B. Key responsible group: Enforcement

C. **FY 2009-2010 Commitment Narrative:**

**For non -Title V sources, the state will, to the extent resources allow:**

1.0 Violation Identification and Documentation

1.1 The AQD will participate in monthly conference calls with the U.S. EPA to provide updated enforcement status information for High Priority Violators (HPV) [\*], identify new HPVs, identify new continuous emission monitor (CEM) violations, and discuss zero date, case lead, evidence, time line for resolution and injunctive and penalty relief, and use of the Supplemental Environmental Project (SEP) Policy, dated May 1, 1998. Violations of federal asbestos demolition/renovation regulations and federal multi-media violations will be discussed in the same manner.

2.0 Escalated Enforcement

- 2.1 The AQD will initiate the appropriate escalated enforcement response for all State Implementation Plans, New Source Performance Standards, prevention of significant deterioration, non-transitory National Emission Standards for Hazardous Air Pollutants (NESHAP), and maximum achievable control technology violations statewide consistent with the U.S. EPA's revised HPV/T&A Guidance, dated December 22, 1998. The AQD's specific commitment on case timeliness is item 2.2, below.
- 2.2 The AQD will identify and treat as an HPV, any source that fails to run a federally required CEM, submit data, or maintain compliance with emission limitations (as shown by CEM data) where use of CEM data is the compliance determination method.
- 2.3 The AQD commits to require, where appropriate, that violating sources enter into formal enforceable stipulation agreements. The state will pursue appropriate penalties for all HPVs consistent with the U.S. EPA's revised HPV/T&A Guidance, dated December 22, 1998.
- 2.4 The AQD will initiate appropriate enforcement action that may include revocation of the permit to install or permit to operate against all sources that do not provide a timely and satisfactory corrective program for significant permit violations.

2.5 The AQD will take appropriate enforcement action on asbestos demolition/renovation work practice violations, consistent with the U.S. EPA's revised HPV/T&A Guidance, dated December 22, 1998, and the revised asbestos NESHAP Strategy Addendum, dated October 27, 1993, as well as the Asbestos Penalty Policy Guidance, dated May 5, 1992.

### 3.0 Escalated Enforcement Activities

3.1 The AQD commits to perform the following escalated enforcement activities for all violations referred for enforcement action, including all identified as HPVs. This includes the following activities:

- a) Review documentation of the violations, staff observations, and other file materials to identify potential enforcement options, which may include the U.S. EPA involvement related to HPVs.
- b) Determination of an enforcement strategy, in consultation with field staff and the Michigan Department of Attorney General (MDAG).
- c) Preparation of enforcement documents such as Enforcement Notices, Administrative Complaints, and Consent Orders.
- d) Conduct negotiations with violators.

3.2 The AQD commits to provide litigation support on all air violations referred to the MDAG for formal enforcement action. Activities include coordination of technical support for litigation, preparation of litigation summaries, case research, witness preparation, and other assistance to the case attorney.

3.3 The AQD commits to continue development of enforcement procedures as needed.

3.4 The AQD agrees to work with the Region to perform field investigations and case development for regional enforcement initiatives as the AQD resources allow. Inspection reports and case documentation shall be prepared as requested.

Notes: [\*] High Priority Violator is defined to include the following:

1. A major source in violation of a SIP requirement.
2. A major source in violation of a federal regulation (NSPS, NESHAP, MACT, PSD, Offset, or a Major Offset or PSD source operating without an Offset or PSD permit).
3. A major source operating in violation of a substantive term of an order previously entered to resolve an HPV.
4. A major source in substantial violation of the obligation to submit a Title V permit application or failure to comply with Title V certification requirements.
5. A "synthetic minor" source which violates an emission limitation or permit condition that affects the source's PSD, NSR, or Title V status.
6. A major source in violation of an emission limitation or other standard, which meets the criteria, specified in the High Priority Violation Matrix, Section II.B, of the U.S. EPA's revised HPV/T&A Guidance, dated December 22, 1998.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Compliance Program

Item: PPA-4-4

PPA Title: Continuous Emission Monitoring (CEM)

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): Gerald Avery and  
Karen Kajiya-Mills

A. Key responsible person(s): Gerald  
Avery and Karen Kajiya-Mills

B. Key responsible group: Technical Programs  
Unit

B. Key responsible group: Technical  
Programs Unit

**C. FY 2009-2010 Commitment Narrative:**

**For non-Title V sources, the state will, to the extent resources allow:**

1.0 CEM Operation

The Air Quality Division (AQD) will require the installation and operation of CEM on all sources subject to CEM requirements under current state or federal regulations. The AQD will also notify all sources that are required by federal or state regulations to install and operate CEM to submit quarterly Excess Emission Reports (EER) and periodic quality assurance test results.

2.0 Inventory

The AQD will maintain an up-to-date database of all facilities subject to a CEM requirement in the state implementation plan (SIP) or New Source Performance Standards (NSPS). The database will include information on the facility, type of source, emission limits/permits, monitoring, and quality assurance.

3.0 Review and Documentation

3.1 The AQD commits to continue to quality assure existing and new monitors at sources subject to NSPS or SIP requirements.

Quality assurance of monitors shall include review and approval of the monitor certification test, quality assurance/quality control (QA/QC) program, and the most recent performance audit.

3.2 The AQD commits to review and track quarterly EERs for monitors subject to NSPS and SIP requirements.

3.3 The AQD commits to review and approve the location for monitors installed on all new sources subject to NSPS regulations and state Part 11 rules.

#### 4.0 Reporting

Within 60 days of the end of each quarter, the AQD commits to electronically submit to the U.S. EPA the following information:

- a) Updates of the AQD's CEM inventory. This includes information on site identification, description of the source, stack parameters, enforcement status, monitor descriptions, certification dates, and the dates of the most recent quarterly QA/QC performed on the monitors.
- b) Copies of all CEM certification letters sent to facilities during the quarter. The letters will indicate if the monitor is a new installation or a replacement monitor.
- c) Summaries of all quarterly excess emissions and monitor performance from facilities required to report to the U.S. EPA and the AQD.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Compliance Program

Item: PPA-4-5

PPA Title: National Emission Standards for Hazardous Air Pollutants (NESHAP) Asbestos  
Demolition/Renovation (demo/reno) Compliance Program

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): Gerald Avery and  
Karen Kajiya-Mills

A. Key responsible person(s): Gerald  
Avery and Karen Kajiya-Mills

B. Key responsible group: Technical Programs  
Unit

B. Key responsible group: Technical  
Programs Unit

**C. FY 2009-2010 Commitment Narrative:**

1.0 Inspections

1.1 The Air Quality Division (AQD) commits to conduct inspections of Asbestos demo/reno projects in accordance with the U.S. EPA's "Implementation Strategy for Revised Asbestos NESHAP," dated January 1991. Facilities to be inspected will be identified through notifications, complaints, and other elements of the non-notifier program. Conducting inspections identified from complaints is a high priority for the program because many of the complaints involve violations of the Asbestos NESHAP. Inspections will also be conducted based on Asbestos notifications for demo/reno projects. A total of 275 inspections will be conducted, provided 2.33 inspectors are devoted to the AQD's Asbestos NESHAP program.

1.2 The selection of which Asbestos demo/reno projects for which notification has been provided will be inspected based upon an inspection targeting ranking system consistent with the U.S. EPA's "Implementation Strategy for Revised Asbestos NESHAP," dated January 1991. Rankings will be documented and maintained on a computer based logging system.

1.3 For each inspection of Asbestos NESHAP demolition projects as well as abatement projects, and landfills receiving Asbestos waste, an inspection checklist will be completed. Upon identification of a potential violation, appropriate sampling and analysis for Asbestos content will occur. The samples will be maintained under proper chain-of-custody for a period of five years.

2.0 Documentation and Review

2.1 The AQD commits to review all Asbestos demo/reno notices received to ensure each notice is timely and complete. The AQD will retain the original notice. When a late or incomplete notice is received, contact will be made with the noticing party within two working days requesting missing information for incomplete notices. The response will be reviewed to ensure that the missing information is supplied.

2.2 The AQD commits to maintain documentation of all subject notifications received, inspections conducted, and violations cited for notification deficiencies and work practices. Information will be maintained on a computer database system.

### 3.0 Reporting

3.1 Within 30 days of the end of each quarter, the AQD commits to submit quality assured quarterly reports on a disk. The reports will include the following information for activities occurring during the quarter:

- a) Information on all NESHAP subject demo/reno notifications received, including: the postmark date, project dates, facility name and address, abatement and demolition contractors, disposal site, late and incomplete deficiencies, deficiency letter date, party determined to be responsible for deficiency, and which notifications are for emergency removal or ordered demolition projects.
- b) Inspections conducted, including the date of inspection, identification of work practice violations, date the Violation Notification (VN) was sent, date order entered, and date of referral to the U.S. EPA or the Michigan Department of Attorney General for litigation.

3.2 The AQD commits to submit, upon request, inspection reports in accordance with the Asbestos NESHAP strategy.

### 4.0 Non-notifier Program

The AQD's Non-notifier Program will continue to focus on outside agency coordination, self initiated inspections, and receipt of complaints to identify the NESHAP subject facilities that do not comply with the notification requirements. When traveling to targeted demo/reno projects for inspection, efforts are made to investigate demo/renos discovered. To the extent feasible, non-notifiers are identified through coordination with state and local agencies that issue building and demolition permits, inspect demo/reno projects, or administer other state or federal Asbestos programs. In addition, the AQD's outreach efforts identify how citizens and industry personnel can report non-notifiers and other potential Asbestos NESHAP violations.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Compliance Program

Item: PPA-4-6

PPA Title: Legal Services, Attorney General

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): Tom Hess

A. Key responsible person(s): Tom Hess

B. Key responsible group: Enforcement Unit

B. Key responsible group: Enforcement Unit

**C. FY 2009-2010 Commitment Narrative:**

**For non-Title V sources, the state will, to the extent resources allow:**

The Air Quality Division (AQD) commits to maintain legal services from the Michigan Department of Attorney General to provide the following:

1. File litigation, as appropriate, to enforce the federal Clean Air Act (CAA) and the air pollution control portion of the Natural Resources and Environmental Protection Act. Defend the AQD on all litigation filed against these parties involving air pollution matters.
2. Support administrative enforcement actions through discussions about choice of enforcement options, review of enforcement documents, and representing the AQD in contested case hearings.
3. Serve as Legal Counsel to the AQD. Participate in and prepare legal documents for all declaratory ruling requests.
4. Provide legal or enforceability certifications, as required under the federal CAA.
5. Advise the AQD on legal issues, particularly on the legality and defensibility of individual policy decisions.
6. Serve as liaison with the U.S. EPA Regional Counsel on joint enforcement actions.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit).

Date: July 1, 2009

Program Category: Air Management

Index: PPA-5

PPA TITLE: Operation of Ambient Air Quality Monitoring Network

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY2010:

A. Key responsible person: Craig Fitzner

A. Key responsible person: Craig Fitzner

B. Key responsible group: Air Monitoring Unit

B. Key responsible group: Air Monitoring Unit

**C. FY2009 Accomplishment Narrative:**

During FY2009, the AMU operated its air monitoring network in accordance with the USEPA approved standard operating procedures.

In FY2009, staffing levels in the Air Monitoring Unit (AMU) remained unchanged from FY2008. However, AMU had two positions (one staff position responsible for site maintenance and one site contractor responsible for sample collection) off work due to medical concerns between February and May 2009.

The AMU continued to operate three air toxics monitoring stations (River Rouge [261630005], Detroit-Fort Street [261630015] and Dearborn [261630033]) as part of the Michigan Toxics Air Monitoring Program (MITAMP) and MDEQ's National Air Toxics Trend Site (NATTS) networks. During FY2009, AMU added sampling for PM10 manganese at River Rouge and PAH sampling at Dearborn.

MDEQ continues to work with the Wisconsin Department of Natural Resources (WDNR) and the Minnesota Air Pollution Control Agency (MAPCA) to outfit and operate an ambient mercury monitoring trailer.

In FY2009, the AMU continued its Memorandum of Agreement (MOA) with the Little River Band (LRB) of Ottawa Indians to and the Grand Traverse Band of Ottawa and Chippewa Indians (GTB) to support their ozone monitoring efforts in Manistee (261010922) and Peshawbestown (260890001), respectively.

The AMU worked with EPA to initiate Cr+6 and metals monitoring at Lincoln Park Elementary in Muskegon (261210041) and VOC monitoring at Spain Elementary in Detroit (261630045) in response to the USA Today articles on air pollution occurring near the country's schools.

The AMU sent two staff members to the Region 5 Air Monitoring Contacts meeting held April 21-22 in Chicago.

AMU staff continues to represent the MDEQ and the other Region 5 State agencies on the National Association of Clean Air Agencies' monitoring steering committee. As such, AMU staff attended the June 2-3, 2009 meeting of the committee in Baltimore.

The AMU hosted Wayne State University researchers at its Detroit-Southwestern High School (261630015) and Detroit-East 7 Mile (261630019) stations so to compare the passive monitoring techniques that they are developing with the EPA FRM and FEM methodologies deployed by MDEQ. In addition, the AMU hosted the University of Michigan's Department of Atmospheric Sciences at its Joy Road (261630026) and East 7 Mile (261630019) stations in Detroit so that they could test a new portable temperature probe prototype.

### **Quality Assurance Program**

The AMU continued to conduct audits on its particulate, gaseous, and toxic monitors. Flow audits were also conducted at several industrial monitoring sites.

The AMU continued to collect precision and accuracy data in accordance with its standard operating procedures.

USEPA staff certified the AMU primary ozone standard at the Region 5 offices on January 28-29, 2009.

On June 16, 2009, AMU worked with the USEPA contractors responsible for the NATTS audit performed at the Dearborn air monitoring station and at the MDEQ lab.

The AMU updated several of its standard operating procedure (SOP) documents during FY2009 including those for gas dilution, inert gas calibration, ozone calibration, meteorological measurements, ozone, nitrogen dioxide, NOy, trace level carbon monoxide, trace level sulfur dioxide, aethalometry, elemental-organic carbon and mercury.

In May 2009, the AMU installed an air conditioner at its Rose Lake (260370001) station to eliminate building temperatures greater than 90° F per EPA's recommendation contained in the their 2008 technical systems audit report.

During the course of carrying out quality assurance activities, the AMU discovered anemometer alignment problems at its Pontiac (261250011), Rochester (261250012) and Sterling Heights-Freedom Hill (260990021) BioWatch stations and temperature probe issues at its Dearborn (261630033) and Detroit Southwestern High School (261630015) stations. Unfortunately, it appears that in each case, the issues originated from when the site in question was originally deployed. Data for all of these sites were corrected and submitted to AQS in June 2009.

The AMU continues to perform system and performance audits as required by MOA at the LRB's Manistee (26101922) and the GTB's Peshawbestown (260890001) ozone monitoring sites.

The AMU sent a representative to the USEPA's National Quality Assurance Conference in San Antonio, May 12-13, 2009.

The AMU sent staff to USEPA training on PM2.5 speciation monitor auditing requirements, held February 23-26, 2009 in Las Vegas.

### **Data Management**

During FY2009, the MDEQ continued to process and report air quality data to AQS. Uploads were made as data became fully quality assured, exceeding the once per quarter requirement mandated by the U.S. EPA.

The AMU certified the ambient data collected during 2008 in a letter to the U.S. EPA dated June 26, 2008.

The AMU continued to upload ozone, continuous PM2.5, and meteorological data to AIRNOW.

The AQD continued its contract with Sonoma Technology to operate the MIair web site so to provide the MDEQ's air monitoring data in near real time to the public.

The AMU submitted the 2010 Ambient Air Monitoring Network Review to the USEPA on June 30, 2009.

Because of staff reassignments in FY2008, AMU was delayed publishing the 2007 Air Quality Report until June 3, 2009. AMU anticipates publishing the 2008 air quality report by September 1, 2009.

The national AIRS conference was not held in 2009.

**F. FY2010 Commitment Narrative, to the extent resources allow:**

**Operation of Ambient Air Monitoring Network**

A draft equipment and CSS&M list for FY2010 is submitted to the USEPA with this PPA.

The AMU will operate its monitoring network in accordance with USEPA approved standard operating procedures.

The AMU will continue to operate the Michigan Toxics Air Monitoring Network (MITAMP) as described in its 2010 Ambient Air Monitoring Review and will continue to coordinate with U.S. EPA in the analysis and the reporting of the data collected.

The AMU 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.

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.

**Quality Assurance Program**

The AMU will strive for greater than 75 percent complete data for all SLAMS sites and at least 90 percent complete data at the Dearborn NATTS site.

The AMU will continue to follow its Quality Assurance Project Plan (QAPP) and update its SOPs when necessary.

The AMU will continue to collect precision and accuracy data in accordance with our standard operating procedures.

Proposed solutions for any technical deficiencies found in any USEPA NPAP audits will be submitted within 30 days, in accordance with Title 40 of the Code of Federal Regulations (CFR) §58.25.

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 2010.

The AMU will participate in any mandated inter-laboratory, NPAP and PEP audits.

If the MOA continues in FY2010, the AMU will perform audits and other support functions at the Manistee (261010922) and Peshawbestown (260890001) ozone monitoring sites.

**Data Management**

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.

The AMU will certify its 2009 ambient air monitoring (and related quality assurance data) to the USEPA by May 1, 2010.

The AMU will continue to collect and upload hourly PM2.5, ozone, and meteorological data to AIRNOW and the MDEQ Mair web site.

Given adequate funding, the AMU staff will attend the national AQS/AIRS conference in 2010.

The MDEQ staff will publish its annual air quality report for 2009 by September 30, 2010.

AMU will submit its 2011 network review to EPA by July 1, 2010 and will work with EPA-Region 5, the Lake Michigan Air Directors Consortium and the other Region 5 states to develop a five year network review document.

**AQD Equipment, CSS&M and Contractual Budget for AMU: \$249,665**

**A. Equipment-\$ 50,500**

Item	Quantity Budgeted	Unit Cost	Item Cost	Running Total Expenditure
URG 3000N Monitor	2	\$11,000	\$22,000	\$22,000
API 4003 Ozone Monitor	2	\$10,000	\$20,000	\$42,000
Data Logger	1	\$8,500	\$8,500	\$50,500

**B. CSS&M-\$ 199,165**

Category	Item	Unit Cost	Item Cost	Running Total
Criteria	Mowing contract (Lansing)	\$ 500	\$ 500	\$ 500
Criteria	Snow removal contracts	\$ 1,000	\$ 1,000	\$ 1,500
Criteria	Heating & cooling unit repair/replacement for shelters (4)	\$ 600	\$ 2,400	\$ 3,900
Criteria	General site maintenance and upgrades	\$ 10,000	\$ 10,000	\$ 13,900
Criteria	Precision & span gases	\$ 6,000	\$ 6,000	\$ 19,900
Criteria	Misc. telecommunication and electrical upgrades and monthly access fees	\$ 10,000	\$ 10,000	\$ 29,900
Criteria	Spare parts and repair costs for criteria pollutant monitors	\$ 50,000	\$ 50,000	\$ 79,900
Criteria	Web site annual service and enhancement contract (Sonoma)	\$ 10,000	\$ 10,000	\$ 89,900
Criteria	ESC annual service contract	\$ 5,000	\$ 5,000	\$ 94,900
Hg	Lumex calibration	\$ 750	\$ 750	\$ 95,650
Hg	Air gases for Tekrans	\$ 1,315	\$ 1,315	\$ 96,965
Hg	Misc. trailer parts and repair	\$ 2,600	\$ 2,600	\$ 99,565
Hg	Misc. Tekran parts and repair	\$ 1,500	\$ 1,500	\$ 101,065
MITAMP	5 boxes carbonyl cartridges	\$ 220	\$ 1,100	\$ 102,165
MITAMP	Through the probe audit gases	\$ 11,000	\$ 11,000	\$ 113,165
MITAMP	MDEQ lab analysis--VOC	\$ 50,000	\$ 50,000	\$ 163,165
MITAMP	MDEQ lab analyses--carbonyls	\$ 20,000	\$ 20,000	\$ 183,165
MITAMP	MDEQ lab analyses—trace metals	\$ 10,000	\$ 10,000	\$ 193,165
QA	Audit gases	\$ 3,000	\$ 3,000	\$ 196,165
QA	Misc. plumbing/connectors	\$ 500	\$ 500	\$ 196,665
QA	Met data auditing supplies and calibrations	\$ 2,000	\$ 2,000	\$ 198,665
QA	Flow meter recertification	\$ 500	\$ 500	\$ 199,165
			<b>TOTAL CSSM</b>	<b>\$ 199,165</b>

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit).

Date: July 1, 2009

Program: Air Management

Item: PPA-6

PPA Title: Point Source Emissions Data

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person: Thomas Shanley,  
Supervisor

A. Key responsible person: Thomas Shanley,  
Supervisor

B. Key responsible group: Emissions Reporting  
and Assessment Unit

B. Key responsible group: Emissions Reporting  
and Assessment Unit

**C. FY 2009-2010 Commitment Narrative, to the extent resources allow:**

The Air Quality Division (AQD) will submit the year 2008 point source emissions data 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 June 1, 2010. The AQD will continue to devote resources to upgrade the state inventory system to ensure compatibility with new data formats and the data reporting requirements identified in 40 CFR, §51.1 – 51.50. The AQD is in the process of rebuilding the Michigan Air Emissions Reporting System (MAERS). Part of the rebuilding includes upgrading data exchange capabilities which is funded by a separate grant from EPA.

As resources allow, the AQD will send representatives to appropriate 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.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)  
DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Air Management

Item: PPA-7

PPA Title: Great Lakes Air Toxics Deposition

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key Responsible Person: Joy Taylor Morgan

A. Key Responsible Person: Joy Taylor  
Morgan

B. Key Responsible Group: Air Quality Evaluation  
Section

B. Key Responsible Group:  
Air Quality Evaluation Section

**C. FY 2010 Commitment Narrative, to the extent resources allow:**

The Air Quality Division (AQD) will participate in research projects and policy issues that address identification and reduction of persistent bioaccumulative air toxic pollutants.

The AQD will continue to participate in the development of the regional air pollutant inventory development system (RAPIDS) currently administered by the Great Lakes Commission (GLC) in coordination with the EPA efforts. The AQD will continue to submit Great Lakes air toxics emissions data to the EPA and the GLC in RAPIDS format. An emphasis on a mercury emissions inventory will be added.

The AQD will participate in the Great Lakes Atmospheric Deposition (GLAD) Planning Process and work with other partners in the region on policy issues, supporting research that address atmospheric deposition of persistent bioaccumulative pollutants to inland lakes and the Great Lakes.

The AQD will participate in work groups and task forces on atmospheric deposition of air toxics as appropriate and as resources allow.

The AQD will continue various 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 into Michigan's environment.

The AQD will implement area source MACT programs for which MDEQ-AQD has taken delegation.

The AQD will continue use of mercury monitoring equipment purchased with Great Lakes Section 105 Grant (GLAD) funds as resources allow, coordinating with Minnesota and Wisconsin on the shared use of this equipment.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program Category: Air Management

Item: PPA-10

PPA Title: Market-based Initiatives

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:  
Discontinued

A. Key responsible person: Robert Irvine

A. Key responsible person:

B. Key responsible group: Strategy Development Unit

B. Key responsible group:

**C. FY 2009 Commitment Narrative:**

The AQD will discontinue the emissions trading program (ETP) and complete the rulemaking process to rescind the ETP rules.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for planning  
purposes only and not subject to audit.)

Date: July 1, 2009

Program: Air Management

Item: PPA-11

PPA Title: New Source Review

PROJECTED STATUS AT END OF  
FISCAL YEAR (FY) 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key Responsible Person: Lynn Fiedler

A. Key Responsible Person: Bill Presson

B. Key Responsible Group: Permit Section

B. Key Responsible Group: Permit Section

**C. FY2009-2010 Commitment Narrative, to the extent resources allow:**

Permit applications for minor (non-Title V) sources were processed in accordance with the requirements identified in this PPA. Final action was taken on 656 minor permit applications (592 approvals, 5 denials, and 59 voids). Additionally, the 13 Prevention of Significant Deterioration (PSD) permits were issued according to federal requirements. There have been no non-attainment major source permits issued. Reviews included the evaluation of the permit applications for compliance with state regulations such as air toxics, state best available control technology (BACT) for new sources of volatile organic compounds, emission limitations, nuisance prohibition, and protection of the National Ambient Air Quality Standards and PSD increments.

Public comment periods and hearings (if requested) were held for a few of these minor sources. Per state requirements, this occurs for those applications judged to be controversial, thus allowing the opportunity for meaningful public participation in the decision-making process, or if emissions, after limitation, are 90% or more of the major source threshold. Sixteen public comment periods were held for non-PSD permits.

One hundred twenty-four sources received coverage under various general permits in the past year. Staff also operated under the completely redesigned permit process. The goal of the process is the expeditious issuance of environmentally sound, operationally flexible, and achievable permits within six months with the requirements clearly identified prior to the application submittal. Permits were issued, on average, within 62 calendar days of receipt. Staff will continue to input the data in the RACT, BACT, LAER Clearinghouse as soon as possible after each PSD permit is issued.

Staff assisted companies by describing the permitting process and requirements during pre-application and permit scoping meetings. Permit staff, in conjunction with the Small Business Clean Air Assistance Program staff, continued to conduct regular training sessions on the requirements of a properly completed permit application.

A SIP submittal for the approval of a state of Michigan PSD program is pending final approval by U.S. EPA. U.S. EPA held a 30 day comment period which was then extended for an additional 30 days (by request). The extended comment period ended on March 12, 2008. Since that time, U.S. EPA has been working on adding the response to comments to the Federal Register (FR) notice. The FR notice is now complete and proceeding through the signature chain within U.S. EPA, once approved, the FR notice will be published.

The draft rules for permitting major sources located in nonattainment areas have been submitted for final approval to the State Office on Administrative Hearings and Rules (SOAHR) and the Legislative Service Bureau (LSB). After both approve the rule package, the nonattainment rules will be submitted to the Joint Committee on Administrative Rules (JCAR) which requires 15 session days before the rules can be approved and submitted to the Secretary of State for final approval. U.S. EPA has been reviewing the nonattainment rules concurrently to streamline their review once Michigan submits them for SIP approval. Final approval of the nonattainment rules is expected by the end of August 2008 within the state and will then be submitted to U.S. EPA for SIP approval.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan Department of  
Environmental Quality (MDEQ)

(The information recorded below is for  
planning purposes only and not subject to audit.)

Date: July 1, 2009

Program: Air Management

Item: PPA-12

PPA Title: Support Services - Laboratory and Maintenance

PROJECTED STATUS AT END OF  
FISCAL (FY) FY 2009:

PLANNED COMMITMENT FOR FY 2010:

A. Key responsible person(s): Amy Butler

A. Key responsible person(s): Amy Butler

B. Key responsible group: Environmental Science  
and Services Division

B. Key responsible group: Environmental  
Science and Services Division

**C. FY 2009-2010 Commitment Narrative, to the extent resources allow:**

**Laboratory Services:**

Provide analytical and technical services that include filter analyses, sample analyses, development of analytical methods, and identification of toxic air pollutants. The laboratory also verifies standards used in the field for calibration of equipment. The MDEQ's Environmental Laboratory Services has been converted to a pay per sample contract. Costs are projected at the rate for analysis of anticipated number and types of samples.

The Air Quality Division contracts with other laboratories for analyses not provided by the MDEQ's Environmental Laboratory Services.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OMB CIRCULAR A-87 COGNIZANT AGENCY

NEGOTIATION AGREEMENT

State of Michigan
Department of Environmental Quality
Lansing, MI

Date: August 12, 2008

Filing Ref: July 5, 2007

The indirect cost rates contained herein are for use on grants and contracts with the Federal Government to which Office of Management and Budget Circular A-87 applies, subject to the limitations contained in the Circular and in Section II, A below.

SECTION I: RATES

Table with 5 columns: Type, Effective Period (From, To), Rate, Base. Row 1: Fixed, 10/1/2008, 9/30/2009, 16.29%, (a)

Basis for Application

(a) Direct salaries and wages and fringe benefits.

Treatment of Fringe Benefits: Fringe benefits applicable to direct salaries and wages are treated as direct costs and charged in accordance with rates established by the State.

SECTION II: GENERAL

A. LIMITATIONS: The rates in this Agreement are subject to any statutory and administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions: (1) Only costs incurred by the department/agency or allocated to the department/agency by an approved cost allocation plan were included in the indirect cost pool as finally accepted; such costs are legal obligations of the department/agency and are allowable under governing cost principles; (2) The same costs that have been treated as indirect costs have not been claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the department/agency which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

- B. CHANGES. The fixed rate contained in this agreement is based on the organizational structure and the accounting system in effect at the time the proposal was submitted. Changes in the organizational structure or changes in the method of accounting for costs which affect the amount of reimbursement resulting from use of the rate in this agreement, require the prior approval of the authorized representative of the responsible negotiation agency. Failure to obtain such approval may result in subsequent audit disallowances.
- C. THE FIXED RATE contained in this agreement is based on an estimate of the cost, which will be incurred during the period for which the rate applies. When the actual costs for such a period have been determined, an adjustment will be made in the negotiation following such determination to compensate for the difference between the cost used to establish the fixed rate and that which would have been used were the actual costs known at the time.
- D. NOTIFICATION TO FEDERAL AGENCIES: Copies of this document may be provided to other Federal agencies as a means of notifying them of the agreement contained herein.
- E. SPECIAL REMARKS: None

ACCEPTANCE

By the State Agency:

Steven E. Chester, Acting  
(Signature)  
Steven E. Chester  
(Name)

Director  
(Title)

MI Dept. of Environmental Quality  
(Agency)

9/5/08  
(Date)

By the Federal Agency:

Jacqueline Smith  
(Signature)

Jacqueline Smith, Rate Negotiator  
Financial Analysis and  
Oversight Service Center  
U.S. Environmental  
Protection Agency  
August 12, 2008

Negotiated by: Jacqueline Smith  
Telephone: (202) 564-5055