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 2013 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, 2012 through September 30, 2013.

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.

[1] See 40 CFR 35.107 for administrative requirements.

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

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 2013 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**
Work collaboratively to address climate change and reduce greenhouse gas emissions through activities including participation in R5-States Climate Change conference calls and promotion of EPA voluntary programs including	Ongoing until project end date		

Energy Star, the Green Power Partnership, Combined Heat and Power, and non-CO_2 reduction programs.			
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 2013 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.	Ongoing	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.	Ongoing	MDEQ will participate in the Conformity Interagency Workgroup meetings and review conformity analysis.	

Work with transportation agencies as appropriate to update mobile SIP budgets in response to changing needs such as updates to the mobile model MOVES or other changes.	9/30/2013	MDEQ will work with transportation agencies as appropriate on mobile SIP budgets and MOVES.	
Update out-of-date conformity SIPs to allow the state to utilize more recent flexibilities in the federal rule.	9/30/2013	MDEQ will update conformity SIPs as necessary.	
Work with EPA to develop creditable mobile source programs.	9/30/2013	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.	9/30/2013	MDEQ will continue to support the Midwest Clean Diesel Initiative including active involvement in state clean diesel coalitions, Smartway, and the promotion, generation, and implementation of clean diesel funding, programs, projects, and policies as resources allow.	
FY 2013 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 AQD 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. The AQD will strive for greater than 75 percent complete data for all state sites and for at least 90 percent complete data at the Dearborn NATTS site. The AQD 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 directly or indirectly through another organization according to schedule in 40 CFR Part 58.	On-going	The AQD 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 Understanding, AQD 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 2012 NAAQS pollutant data in AQS and provide supporting documentation by May 1, 2013, including exceptional event flags.	5/1/2013	The AQD will certify its 2012 ambient air monitoring (and related quality assurance data) to the U.S. EPA by May 1, 2013. If agreed upon in a Memorandum of Understanding, AQD will also certify that ambient air quality data collected by the Little River Band of Ottawa Indians and the Inter-Tribal Council of Michigan.	
Submit XML-formatted AQS data by the end of 2013.	By the end of 2013	The AQD will continue investigate the plausibility of submitting data to AQS via an	

		XML-format by the end of 2013, using commercial software developed by AQD's data acquisition system provider. This investigation is contingent upon the use of EPA funding specified as part of its near road grant award and upon adequate technical and human resources.	
Submit 2014 annual network plan required by 40 CFR § 58.10, by July 1, 2013, unless another schedule has been approved.	7/1/2013	AMU will submit its 2014 network review to the U.S. EPA by July 1, 2013. It is problematic for AMU to commit to new ozone monitoring and/or PM2.5 activities before seeing what is contained in EPA's upcoming NAAQS revisions.	
Ensure adequate, independent QA audits of NAAQS monitors, including PEP and NPAP or equivalent.	On-going	AQD 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 2013. The AQD will participate in any mandated inter-laboratory, NPAP or Performance Evaluation Program (PEP) audits. 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. The AQD will continue to collect precision and accuracy data in accordance with our standard operating procedures. If agreed upon in a Memorandum of Understanding, the AQD will also audit the	

		ozone and PM2.5 monitors operated by the Little River Band of Ottawa Indians and the Inter-Tribal Council of Michigan.	
Report real time ozone and PM2.5 data to AirNOW for cities required to report the AQI.	On-going	The AQD will continue to collect and upload hourly PM2.5, ozone, and meteorological data to AIRNOW and to the MDEQ MIair web site. AQD will also publish an annual air quality report for data collected in calendar year 2012 by Sept. 30, 2013.	
Attend the annual Region 5 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.	Ongoing	At least one member of the AQD's air monitoring staff will participate in monthly State/Local/Tribal monitoring calls as organized by Region 5. Also, given adequate funding, AQD staff will attend the annual Region 5 State, Local and Tribal air monitoring contacts meeting in Chicago or the National Air Monitoring Conference depending upon which meeting is held. If they are held and given adequate funding, AMU staff will also attend the national AQS and QA conferences in 2013.	
Install and begin operation of near-road NO2 monitors for those states covered by phase one of the Build and Hold plan by January 1, 2013.	1/1/2013	The AQD is currently operating two near road monitor stations at Eliza Howell Park in Detroit. AQD will continue the operation of these stations even though EPA has rolled back the requirement to do so until January 2014.	
Convert airport study lead monitors from special purpose monitors to required SLAMS for any monitors that recorded design values exceeding 50% of the lead NAAQS.	Ongoing until project end date	The AQD has proposed in its 2013 network review to shut down the Pb monitor at Oakland County International Airport (PTK) as data collected thus far is below one-half of the NAAQS. AQD will ensure that any such shutdown will be based upon one complete	

		year of data.	
Conduct monthly QA checks for flow rates of PM2.5 speciation monitors and submit data quarterly to AQS. Target is for 75% completeness.	Ongoing until project end date	AQD will conduct speciation flow checks monthly and submit them into AQS quarterly. AQD will strive for at least 75% complete data.	
FY 2013 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.	As agreed upon in approved maintenance plans if applicable.	For new violating attainment areas, MDEQ will examine and implement contingency measures as described in maintenance plans, as applicable.	
As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data.	None.	PM2.5 SIP redesignation submitted in FY11; no additional redesignations expected in FY13.	
Continue to implement 1997 8-hr ozone SIPs.	Ongoing	State currently in attainment. MDEQ will continue maintenance area requirements.	
Submit any outstanding 1997 $PM_{2.5}$	None	All required PM2.5 SIPs have been submitted and are awaiting EPA action.	
Prepare recommendations on designations for revised NAAQS.	One year after promulgation of revised NAAQS.	If new ozone or PM2.5 NAAQS out, MDEQ will propose new nonattainment areas as appropriate, within one year. Other NAAQS as appropriate.	
Facilitate implementation of NOx and SO2 Requirements under Transport Rule.	As required by CAIR	MDEQ will work with CAMD and affected utilities to ensure proper allocations, etc. under CAIR.	
Consult with EPA, as necessary, to finalize area	Before and during EPA's	MDEQ will consult with EPA, as necessary, to finalize the area designation for the SO2	

designations for SO_2 primary NAAQS.	120-day process for SO2.	primary NAAQS.	
Continue to implement SIPs for 1997 PM 2.5 and ozone NAAQS.	9/30/2013	1997 PM 2.5 and ozone NAAQS being attained statewide. Maintenance Plans in place.	
Submit 2006 PM 2.5 NAAQS attainment demonstration SIPs by December 2012.	December 2012	Nonattainment area attaining and re-designation SIP submitted in FY11, pending EPA action.	
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.	9/30/2012	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.	None	PM2.5 infrastructure SIPs submitted in FY11 and Lead infra. SIP submitted in 2012; pending EPA action.	
Submit SIPs for the lead NAAQS.	Due June 2013	MDEQ work on SIP for lead NAAQS to proceed in FY13.	
Submit SIPs for the areas designated lead nonattainment areas in December 2010.	None	Not applicable	
Conduct public notification and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution.	As necessary on forecasted high pollution days.	MDEQ will continue to conduct public notification and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution.	
Optional: 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).	9/30/2013	MDEQ will consider this information in FY13 planning efforts as appropriate.	

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.			
Work with EPA to recognize and address environmental justice issues that can be addressed in SIPs.	As opportunities arise.	MDEQ will address as appropriate.	
Explore feasibility of changing out existing outdoor wood-fired boilers to significantly reduce PM2.5 concentrations. Implement strategies for controlling emissions from wood smoke where it is a primary contribution to air quality problems, including woodstove changeout and Burnwise education campaigns. Work with local area stakeholders to support innovative, voluntary, early action initiatives such wood smoke reduction programs	As available.	MDEQ will continue to evaluate this issue as resources allow.	
Assist with outreach and capacity building for minority, low-income and indigenous communities to improve understanding of and engagement in regulatory and permitting processes.	9/30/2013	MDEQ will address this as resources allow.	

Develop and submit 2010 NO_2 and SO_2 NAAQS infrastructure SIPs in 2013.	Within 6 months of guidance	MDEQ will develop and submit NO2 and SO2 infrastructure SIPs in 2013 following EPA issuance of guidance.	
States with active Stage II gasoline vapor recovery programs that want to remove the state rules submit SIP revisions.	None	Not applicable	
Develop and submit infrastructure SIPs for the 2008 ozone NAAQS	Within 6 months of guidance	MDEQ will develop and submit an infrastructure SIP for the 2008 ozone NAAQS following EPA issuance of guidance.	
Convert, where desired, CSAPR FIP into a SIP.	None	Not applicable for the current timeframe.	
Implement mobile source control strategies (such as I/M programs and Transportation Control Measures) on time and consistent with SIP commitments.	As required by guidance.	MDEQ will implement as appropriate.	
Submit recommendations for area designations for a potentially revised PM NAAQS.	June 2014 if revised NAAQS promulgated in June 2013.	MDEQ will make recommendations per the required CAA schedule.	
Implement strategies to attain the 2008 lead NAAQS.	Ongoing throughout grant cycle.	MDEQ will implement strategies to attain the 2008 lead NAAQS.	
Develop attainment demonstrations for SO2 nonattainment areas and conduct other SO2 air quality planning in accordance with EPA guidance.	Within 18 months of the effective date of designation.	MDEQ will develop attainment demonstrations for SO2 nonattainment areas in accordance with the CAA schedule and will conduct other SO2 planning per EPA guidance.	

FY 2013 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.	Ongoing	MDEQ will continue to work with EPA, Region 5 on issues related to submitted regional haze SIP.	
Implement BART requirements.	Ongoing	MDEQ will implement BART requirements as applicable.	
Submit any outstanding regional haze SIP elements.	None	MDEQ has submitted all haze SIP elements.	
Submit interim progress report SIP due 5 years after the submittal of the initial Regional Haze SIP as required under 51.308(g).	FY 2015	MDEQ will submit the interim progress report by its required date in 2015.	

FY 2013 - 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.)			
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	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.	

accepted date" and "the permit issuance date" in to the RBLC national database.			
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.	
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 2013 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 2011 inventory data by 12/31/12	The AQD will submit the year 2011 point, area, and mobile source emissions data elements, 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) consistent with the 2011 NEI Plan prior to December 31, 2012. The AQD will continue to devote resources toward continued enhancement and improvement of the state inventory system to ensure data quality, compatibility with continuously evolving new data formats and elements, and the data reporting requirements identified in 40 CFR, §51.1 – 51.50. 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 and regional photochemical modeling inventories for use in attainment demonstrations and will participate in the development of a regional inventory to support planning efforts.	
Implement delegated or approved section 112 (MACT and residual risk) 111(d) and 129 standards, as appropriate, for major sources residual risk, and area sources.	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	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. Will re-evaluate the state's air toxics regulations with assistance from the Air Toxics Committee, an AQD stakeholder workgroup.	
Address concerns for ambient air manganese levels	9/30/2013	Continue to utilize the AQD's March 27, 2012 manganese report and other manganese information including air emissions data and monitoring data to further address health concerns	

		regarding elevated ambient air manganese levels in the Detroit area and near foundries where ambient air monitoring data may indicate concerns. Will continue to follow manganese risk assessment developments by EPA and ATSDR.	
Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting.	9/30/2013	Will participate in all scheduled activities.	
Utilize the National Scale Air Toxics Assessment (NATA) to evaluate ambient levels and high concern air toxics sources	9/30/2013	Will continue to review and utilize the 2005 NATA study results as needed in New Source Review to account for background air toxics levels in cumulative exposure and risk assessments. Will evaluate high-risk estimates as resources allow.	
Provide community data analysis and address environmental justice concerns	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	9/30/2013	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.	

Participate in mercury reduction efforts	9/30/2013	Continue efforts focused on monitoring and reduction activities related to sources that emit mercury and products that contain mercury and assess 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 assess the implementation of the DEQ Mercury Strategy.	
Address mercury emissions from EGUs	9/30/2013	Continue to implement rules restricting mercury emissions from EGUs.	
Participate in the Great Lakes Air Toxics (GLAT) Deposition Program	9/30/2013	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.	
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 2013 Monitoring			
	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, negotiation and approval by EPA.	August 31, 2013	The AQD agrees to draft a CMS plan.	
Implementation of the final CMS plan will begin the upcoming federal fiscal year. CMS plan should meet EPA's 2010 CAA Stationary Source CMS policy.	October 1, 2013	The AQD agrees to implement the final CMS plan.	
CMS plan source category and frequency flags in AFS will be completed for the non-Title V source universe by December 1, 2013.	December 1, 2013	The AQD agrees to complete CMS plan source category and frequency flags in AFS.	
EPA shall submit written correspondence to the State accepting or not accepting the CMS plan submitted.	January 1, 2014	No commitment is required from MDEQ.	
Respond to citizen complaints, including those referred by EPA. Inspect as necessary.	Ongoing until Project End Date	The AQD agrees to respond, track and document all air pollution complaints that are received. All violations will be documented and tracked in MACES.	
Track and update EPA on recommendations made during the State Review Framework until completion.	Quarterly	The AQD agrees to keep EPA updated on recommendations made during the State Review Framework as it pertains to non-Title V sources.	

Require installation, operation and reporting of COMS and/or CEMS on all sources subject to requirements under State or Federal.	Ongoing until Project End Date	The AQD agrees to maintain a database of all sources subject to CEMS requirement in the SIP, NSPS or NESHAP regulations.	
Review and track quarterly COMS/CEMS excess emission reports (EERs) that are submitted by subject 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.	
Enforcement – FY 2013 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 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	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.	

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 2013			
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 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.	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.	
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.	Quarterly	The MDEQ agrees to provide EPA with status updates of sources placed on the EPA's Watch List.	

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.			
State will conduct its enforcement activities in 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.	Ongoing	The MDEQ agrees to conduct its enforcement activities in accordance with appropriate EPA policies.	

BUDGET DETAIL

Category	Federal	State	Subtotal
1. Personnel Indicate personnel/FTE that will be working on work plan elements.	2,000,500	2,082,154	4,082,655
2. Fringe Benefits Indicate the mandated and voluntary benefits to be supplemented with these funds.	1,555,590	1,619,083	3,174,673
3. Supplies 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.	58,387	60,770	119,157
4. Equipment 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.	0	0	0
5. Contractual Indicate any proposed contractual items that are reasonable and necessary to carry out the work plan objectives.	57,575	59,925	117,500
6. Travel Indicate number of individuals traveling, destination, number of trips, and reason for travel.	63,224	65,804	129,028
7. Other Indicate general (miscellaneous) expenses necessary to carry out objectives stated in the work plan.	380,310	304,983	685,293
8. Total Direct Charges Summary of all costs associated with each object-class category.	4,115,586	4,192,719	8,308,305
9. Total Indirect Costs Organization must provide documentation of a federally approved indirect cost rate (percentage) reflective of proposed project/grant period.	595,290	619,587	1,214,877
Total Cost Indicate overall figure of all direct and indirect costs.	4,710,876	4,812,306	9,523,182