

Air Quality Planning and Management Unit FY 2008 Priorities for Montana

1. PM2.5 NAAQS

Libby PM2.5 Nonattainment area

- Continue to bring Libby into attainment for PM 2.5
- Support woodstove change-out program
- Continue attainment SIP development

-Develop and provide recommendations from the Governor to EPA for the new PM2.5 NAAQS designation of attainment or nonattainment by December 2007 including assessments of boundaries for areas expected to be designated nonattainment (Libby, Missoula, Hamilton and Butte).

2. 164(e) PSD Tribal Issue

- State conduct increment modeling
- EPA conduct visibility modeling

3. National Environmental Policy Act (NEPA) Work

Support, as resources allow, activities related to NEPA, including reviewing air quality impacts disclosed in NEPA documents and participating in NEPA-related working groups with EPA, BLM, and other affected agencies. Support continued activities of the Powder River Basin Interagency Air Quality Task Group (AQTG) or other forums as needed to protect air quality in Montana consistent with the forthcoming record of decision (expected in 2007) for the Draft Supplement to the Montana Statewide Oil and Gas Environmental Impact Statement and Amendment of the Powder River and Billings RMP's.

4. Monitored/Modeled NAAQS Violations

-Review with Region 8 the OAR Annual Air Quality Reports for criteria air pollutants and take appropriate actions dealing with areas newly discovered violating the NAAQS.

-Document, and take appropriate actions for, modeled NAAQS violations identified through new source permitting or other actions. Identify whether existing sources, stationary or area source growth, is suspected of causing the NAAQS violation. Notify EPA of the modeled NAAQS violation and provide EPA with a copy of the results within 60 days of completion.

5. SIPS Revisions

- Identify new SIP submittals expected to be submitted by the state.
- EPA/State prioritize SIP actions (SIP status tables to be provided during PPA discussions).
- EPA/State hold quarterly calls/meetings to discuss SIP status.

6. Emissions Inventory

-By June 1, 2008 report required point source actual annual emission data for 2006 to the National Emission Inventory based on the following minimum reporting thresholds:

$$\begin{aligned} \text{SO}_x, \text{NO}_x \text{ and CO} &\geq 2500 \text{ tons/yr} \\ \text{VOC, PM}_{10}, \text{PM}_{2.5} \text{ and NH}_3 &\geq 250 \text{ tons/yr} \end{aligned}$$

-Review and quality assure the integrated 2005 HAP emissions inventory in order to develop a more accurate, robust NEI and to assist Montana's toxics reduction strategy.

7. East Helena SO₂ and Lead

-State/EPA discuss strategy for Helena Secondary SO₂ Attainment SIP and E.Helena SO₂ and Lead redesignation to attainment and Maintenance Plans

Air Technical Assistance Unit Regional Focus on National Program and Grant Guidance FY2008 for Montana

State Specific Items

Monitoring

- Region 8 encourages MT DEQ to continue their level of effort and quality with this program.
- MT DEQ is in the final stages of developing a complete and up to date QAPP for their ambient air monitoring program. MT DEQ should begin to plan for the development of their required QMP for this program.
- MT DEQ is encouraged to revisit their ambient air monitoring network based on the new requirements for PM. As discussed with the state, preliminary analysis by Region 8 indicates that additional PM_{2.5} monitoring (continuous monitors in Helena and Missoula) may be required in order to be in compliance with the new regulations.

- MT DEQ is encouraged to continue their efforts related to the PM_{2.5} designation process. Region 8 and MT DEQ have been working together on the data analysis, design value calculations, data flagging issues and completeness determinations as part of the designation process. This early and continued coordination makes this an efficient process.

Permits

- Work with EPA to improve communication on high profile permitting actions (i.e. permitting actions that have generated a significant amount of public interests, citizens' complaints and /or "environmental groups" comments or interests).
- Since Montana did not participate in the initial beta test of the TOPS system, we are asking that Montana pay particular attention to preparation for the final roll-out.
- The Region will be conducting follow-up Title V program evaluations. For FY08, these program evaluations will be conducted in Colorado, Wyoming, and Montana

Air Toxics

- States should continue to adopt and implement delegated section 112 standards and revisions as appropriate.
- National Guidance continues to focus attention on the development of community based air toxics reduction programs. The Region will assist States in the identification of communities that might have a disproportional risk from air toxics and support the State and locals in the development of strategies to reduce risks in those communities.
- States are encouraged to continue or to initiate the following related to community based air toxics. State are encouraged to: 1. Attend regional meetings and conference calls which will focus on sharing information and building State capacity to identify, characterize and address air toxics risks in its communities. 2. Identify and assess suspected air toxics risks in local areas and develop strategies to address areas for reductions. 3. Seek voluntary reductions of air toxics, as appropriate and reasonable. This can be accomplished in many ways, including but not limited to: pollution prevention; supplemental environmental projects (SEP); education and outreach; and voluntary diesel retrofits.

Monitoring Program

- The National Monitoring Rule was promulgated at the end of FY06, making FY07 the first year under a revised 40 CFR Part 58. Key points of the proposed rule are reporting of PM2.5 blank data to AQS, reporting of continuous PM2.5 data to AQS with appropriate parameter codes, new ozone and continuous PM2.5 requirements based on population and proximity to the NAAQS, removal of minimum monitoring requirements for CO, SO2, NO2, the establishment of NCore sites (with higher sensitivity CO and SO2 instruments than at typical ambient air sites and an NOy instrument) and assessments of redundancies and accompanying reductions in monitoring for non-critical criteria pollutants. Region 8 grantees are expected to aggressively implement the new requirements in the monitoring rule.
- The FY07 103 grants will expire March 31, 2008. The President's FY08 budget request did not include section 103 authority for the fine particulate monitoring (PM2.5) network. Regions and grantees are expected to work toward transitioning from section 103 to section 105 authority after Congress appropriates FY08 funding with this change, and the current section 103 authority PM2.5 monitoring grants expire. Regions and States are further expected to ensure that no specific State/Local activity at any given time and place is supported in both a section 103 and a section 105 grant. Upon confirmation of the termination of the Section 103 grants, Region 8 and state will work to amend the 105 workplan to incorporate the 103 work items. As in the past, grantees are expected to draw down funding on current grants in a timely and consistent manner. Furthermore, each monitoring organization should conduct ongoing critical evaluations of current monitoring networks for identification and retirement of low value monitors.
- Region 8 States and Tribes are required by the recently promulgated monitoring rule to submit all State NAAQS monitoring site data to AQS within 90 days after the end of the monitoring quarter. Per 40 CFR Part 58, data submittals include all quality assurance data (accuracy and precision). Focus should also be on timely maintenance of monitoring site data (start and end dates, geographic coordinates with appropriate datum, etc.). Timely input is a key element in air monitoring grant requirements!
- Updated Quality Management Plans (QMP) and Quality Assurance Project Plans (QAPP) are required for all Environmental Data Operations (EDO) funded by the EPA, and as part of the revised 40 CFR Part 58. A QMP describes the quality system in terms of organizational structure, functional responsibilities of management and staff, lines of authority, and required interfaces for those planning, implementing and accessing activities involving EDOs. Organizations, like Region 8 State monitoring programs, that implement long-term monitoring programs funded by EPA should have a separate QMP document. Smaller organizations (local or tribal agencies) or organizations that do infrequent work

with EPA funds could develop a separate QMP; however, Region 8 encourages them to combine the QMP with the QAPP. States and Tribes must work to develop and maintain proper QMPs and QAPPs for their organizations.

- EPA has transitioned from the mailable NPAP to a combination of the Performance Evaluation Program-PM2.5 (PEP) and the Thru-the-Probe (TTP) NPAP systems. The TTP system will be used as the primary method for NPAP audits. Per 40 CFR Part 58, each primary quality assurance organization's QAPP must contain provisions to provide independent and adequate audits of all monitors. Each primary quality assurance organization must provide for these independent audits either with EPA's PM2.5 PEP and NPAP or with an approved independent audit system. Funding for these audit programs will be provided by each primary quality assurance organization through the 105 grants. Organizations wishing to participate in the EPA's PEP/NPAP program must direct an appropriate amount of grant funds to EPA to support these audits. Organizations intending to use a non-EPA PEP/NPAP supported program should coordinate this approach with the appropriate monitoring EPA contacts.
- While the mailable NPAP has been greatly reduced, it will not be eliminated so that sites that are inaccessible for Thru-the-Probe audits and Industrial Monitors may be verified. Again, quality assurance organizations wishing to participate must direct an appropriate amount of money to EPA for these audits.
- State agencies should coordinate with EPA Region 8 and OAQPS on replacing the older carbon channel of the speciation sampler with the new IMPROVE style carbon sampler on an as needed basis.
- With the promulgation of the Exceptional Event Rule (effective May 21, 2007), states should become familiar with the new provisions and reporting schedules when reporting flags for any Exceptional Events.
- The Monitoring Plan rather than the Network Review is due to EPA July 1 of each year. The Monitoring Plan should be made publicly available 30 days prior to submittal to EPA. Posting the Monitoring Plan to the appropriate agencies website is encouraged.

Air Permitting

- EPA continues to receive a steady flow of Petitions for Title V permits. Responding to these remains a significant workload issue for the Region and, at times, for States as well. To help eliminate the potential for Petitions, States and EPA should closely to resolve issues where a Petition may be filed. This process could take place as early as the draft permit stage where the State and EPA are aware of potential interest from the public on permit requirements and continue through the proposal stage. As States are preparing responses to citizen comments, they should refer to the EPA Petition Database and review past

petition responses from EPA. Many specific issues have been raised in the past and the database provides a good picture of what EPA's position is or would be if we were to receive a Petition on the same issue.

- The Region will be conducting follow-up Title V program evaluations. For FY08, these program evaluations will be conducted in Colorado, Wyoming, and Montana. States will be expected to respond to EPA's program evaluation report within 90 days and the States will need to implement the recommendations the States believe are warranted.
- In FY08, there continues to be an emphasis on tracking timeliness data on new Title V sources, as well as permit renewals and significant permit modifications for existing Title V sources and for NSR permits issued for new major sources and major modifications. States will be required to provide EPA permit information using the new TOPS form provided to the states in FY07 and attached to this guidance. The new TOPs reporting form is designed to meet the reporting requirements for the Office of Management and Budget (OMB) established during OMB's Performance Assessment Rating Tool (PART) review. In addition, States are required to enter appropriate data into the RACT/BACT/LAER Clearinghouse (RBLC) database every 6 months.