

Nashville/Davidson County Air Pollution Control Division
EPA Section 105 Grant
Annual Summary of Performance
FY 2019 Air Planning Agreement
December 30, 2019

Improving Air Quality

Goal: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety.

Objective: Work with states and tribes to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.

FY 2019 105 Grant Commitments:

NAAQS Cross Cutting

- 1. Continue to develop and implement standards, plans, strategies, and actions to preserve air quality in attainment areas and prevent further degradation in areas with the potential to be designated nonattainment in the future. Continue screening of monitoring data for early indication of nonattainment. For areas that violate after the designation, work with Region 4 to develop a plan to expeditiously bring each area back into attainment.**

Nashville/Davidson County Air Pollution Control Division (PCD) continues to implement standards and strategies to preserve air quality for all criteria pollutants.

- 2. Consistent with the national allocation of section 105 grant resources and the states' and locals' voluntary withholding of 105 grant resources for special projects, continue developing regional planning capabilities for National Ambient Air Quality Standards (NAAQS) and regional haze, including emission inventory development, building air quality modeling capacity, other technical analyses and collaboration with other agencies. The state and local contact or section chief in the Air Regulatory Management Section should be notified, at the mid-year point and a month prior to the end of the grant period, via e-mail of how the state or local agency is meeting this grant condition, specifying applicable specific grants or programs.**

PCD continues to develop emission inventories for Davidson County and work with the State and SESARM/Metro4 on special projects.

Implement NSR Programs

- 3. Issue major NSR/Prevention of Significant Deterioration (PSD) permits and minor source permits that comply with CAA requirements and enter Best Achievable Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Achievable Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC).**

PCD issues NSR/PSD permits and contributes to the RBLC, when applicable.

- 4. Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source of modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit.**

PCD maintains continued communication with EPA when a NSR/PSD permit is under review.

- 5. Operate all criteria pollutant monitors and perform requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This commitment includes all reporting and data certification requirements (e.g., annual State and Local Air Monitoring Station (SLAMS) reports and data certifications due by May 1 each year).**

PCD operates a monitoring network in accordance with federal policy and guidance. All certifications are submitted and all data is maintained.

- 6. The agency will collect strip chart data or its electronic equivalent for quality assurance purposes. Electronic strip chart data must be collected on a 1 minute timeframe or less. This data must be retained for a minimum of three (3) complete monitoring years.**

PCD maintains electronic equivalent data for a minimum of three complete monitoring years.

- 7. The State will develop and submit for approval a statewide ambient monitoring network plan. The network plan should be consistent with requirements outlined in 40 CFR 50, 53, and 58. Local agencies will coordinate with their State agencies in the development of this plan. The network plan is to be submitted on or by July 1 of each year incorporating any changes, real or proposed. Include in the network plan a certified evaluation of the agency's ambient monitors and auxiliary support equipment and categorize the condition**

of the equipment as “Good,” “Fair,” or “Poor.” Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in a lab or warehouse). Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as “Poor.”

PCD contributes to the statewide ambient monitoring network plan. This information includes a full inventory of the agency’s monitoring and auxiliary equipment.

8. **Maintain an approved Quality Management Plan (QMP) for the criteria pollutant network. QMPs expire every five (5) years. The QMP will be submitted at least 180 days prior to the expiration of the current QMP electronically to r4sesdairqa@epa.gov or in hard copy to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QMPs must address EPA Requirements for Quality Management Plans (EPA QA/R-2, <http://www.epa.gov/quality/qs-docs/r2-final.pdf>). For additional information and guidance see <http://www.epa.gov/quality/qmps.html>. A tabular listing of the QA documents for the criteria pollutants network maintained by each grantee will be provided to EPA as part of the annual QA competency demonstration submittal highlighted in the reporting requirements document, Item Number 18-14.**

PCD is currently up-to-date on all quality assurance documents.

9. **For all new pollutants to be monitored and methods to be used, a quality assurance project plan (QAPP) must be submitted for approval 180 days prior to the collection of environmental data. Electronic copies may be submitted to r4sesdairqa@epa.gov and hard copies to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf).**

Not applicable in FY 2019.

10. **Maintain an approved quality assurance project plan (QAPP) for the criteria pollutant network. EPA will review the QAPPs submitted by the State and/or local agencies for approval in accordance with the following:**
 1. **The State and/or local agencies will review their QAPPs annually. The review will be documented in an email to r4sesdairqa@epa.gov. The email should state the date of the review and whether the QAPP is adequate as written or requires changes. If revised, the QAPP will be submitted to EPA for approval within 180 days following the date of the email.**

2. The State and/or local agency QAPPs expire every five (5) years and thus will be reviewed, revised and submitted to EPA for approval 180 days prior to expiration of the current QAPP.
3. The State and/or local agency will submit operating procedures (SOPs) associated with the QAPPs. SOPs will be submitted with the revised QAPPs and are referenced during the QAPP review; however, SOPs will not be reviewed or approved.

Electronic copies may be submitted to r4sesdairqa@epa.gov and hard copies to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf).

PCD is currently up-to-date on all quality assurance documents.

11. For all SLAMS and Special Purpose Monitors (SPMs) meeting the requirements of 40 CFR 58, notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutants, including PM2.5. For the 8 hour ozone NAAQS, report all 4th maximum concentrations that are at or above the level of the standard (agencies meet this commitment for monitors that have data reported to AIRNow).

All ozone monitoring data is reported to AIRNow. EPA is notified if/when an exceedance is determined.

12. Comply with the requirements in 40 CFR Section 50.14 regarding treatment of data influenced by exceptional events. (Note: EPA Region 4 will neither review nor concur on either state or local requests to exclude data unless the state is in compliance with the appropriate requirements.)

No exceptional events were reported in FY 2019.

13. In conjunction with the AQI, agencies are encouraged to submit an air quality forecast for MSA's greater than 350,000 people to the EPA AIRNow Website. The air quality forecast should be submitted daily to the AIRNow Website before 3:55 p.m. EDT. The Air Quality Forecast, like the AQI, will be based on the primary criteria pollutant. Unlike the AQI, an index value is not required to be reported as a forecast; instead of the index value, the AQI descriptor value of Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, or Very Unhealthy should be used.

TDEC submits the AQI forecast. PCD posts this information on the Metro Public Health Department website and on a phone recording for the public.

- 14. Support staff participation in the following meetings:**
- a. The annual Region 4 Ambient Monitoring Work Shop; and
 - b. The National Ambient Air Monitoring Conference.

PCD staff attends the Region 4 Ambient Monitoring Work Shop every year. The National Ambient Air Monitoring Conference is also attended.

- 15. SLAMS data for each criteria pollutant monitor must be at a minimum 75% complete on a quarterly and annual basis. Additionally, ozone data must be 90% or more complete on a three year average basis. Notify EPA immediately if a problem arises that will prevent the agency from meeting a data completeness requirement for any pollutant. Provide reasons why the data completeness requirement will not be met, a schedule for correcting the problem, and corrective actions that will be taken to avert the problem from recurring. Notify EPA by mail or e-mail no more than 45 days after the end of the quarter of any monitor not meeting 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA.**

EPA is notified whenever the minimum data requirements are not met.

- 16. As part of the QA competency demonstration submittal (Reporting Requirement 19-14) that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents for the criteria pollutants network maintained by your agency, and the date that each document was most recently revised and approved.**

The QA competency demonstration was submitted.

Address Air Toxics Problems in Communities

- 17. Collect ambient air quality data for toxics from monitoring sites as appropriate for special studies funded under this agreement. Include any planned air toxics monitoring in the ambient monitoring network design plan that is submitted to EPA in July annually. If no monitoring is planned, clearly state, "No monitoring will be performed."**

No air toxics monitoring was performed in FY 2019.

- 18. Maintain an approved quality assurance project plan (QAPP) for the air toxics network. EPA will review the QAPPs submitted by the State and/or local agencies for approval in accordance with the following:**
1. The State and/or local agencies will review their QAPPs annually. The review will be documented in an email to r4sesdairqa@epa.gov. The email should state the

date of the review and whether the QAPP is adequate as written or requires changes. If revised, the QAPP will be submitted to EPA for approval within 180 days following the date of the email.

2. The State and/or local agency QAPPs expire every five (5) years and thus will be reviewed, revised and submitted to EPA for approval 180 days prior to expiration of the current QAPP.
3. The State and/or local agency will submit operating procedures (SOPs) associated with the QAPPs. SOPs will be submitted with the revised QAPPs and are referenced during the QAPP review; however, SOPs will not be reviewed or approved.
4. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed."

Electronic copies may be submitted to r4sesdairqa@epa.gov and hard copies to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf).

No air toxics monitoring was performed in FY 2018.

19. If applicable, encourage laboratories conducting analyses for air toxics to participate in any available national or regional inter-laboratory proficiency testing programs and audits and make identified modifications to enhance data quality.

Not applicable. No air toxics monitoring was performed.

20. If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 120 days from the end of the quarter for all ambient air toxics monitoring data collected.

Not applicable. No air toxics monitoring was performed.

21. As part of the QA competency demonstration submittal that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents for the air toxics pollutants network maintained by your agency, and the date that each document was most recently revised and approved.

Not applicable. No air toxics monitoring was performed.

22. Assume delegation and implementation of all promulgated Clean Air Act Section 112, 111, and 129 rules and standards [National Emission Standard for Hazardous Air Pollutant (NESHAP), and New Source Performance Standards (NSPS)] within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to take delegation via the

Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption.

PCD adopts and enforces all new CAA Section 111, 112, and 129 rules and standards as necessary. Region 4 is notified as applicable.

- 23. Work towards establishing the programmatic expertise to address the risk-based components of Clean Air Act sections 112, 111, and 129, by pursuing risk training when appropriate.**

PCD will work towards establishing programmatic expertise as applicable training is made available.

- 24. Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and provide copies of approvals to the Region upon issuance (see 40 CFR Part 63.91(g)(1)(ii)).**

No alternatives to MACT standards were requested or approved in FY 2019.

- 25. Prepare and submit CAA sections 111(d) and 129 state plans and letters of certification in accordance with regulatory timeframes. In addition, collect and submit reports on progress of sections 111(d) and 129 plans annually, pursuant to 40 CFR 60.25(e) and (f).**

No sources under the jurisdiction of PCD required 111(d) or 129 state plans during FY 2019.

Monitoring and Enforcement

Goals: Cooperative Federalism: Rebalance the power between Washington and the states to create tangible environmental results for the American people. Rule of Law and Process: Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law.

Objectives: Enhanced Shared Accountability: Improve environmental protection through joint governance and compliance assistance among state, tribal, local, and federal partners. Rule of Law and Process: Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law.

FY 2019 105 Grant Commitments:

- 1. Ensure enforcement and compliance monitoring is consistent with the Compliance Monitoring Strategy Policy revised and reissued on July 14, 2014, The Timely and Appropriate Enforcement Response to High Priority Violations Policy revised and reissued on August 25, 2014. Ensure complete, accurate and timely data support of the Integrated Compliance Information System.**

PCD follows the Compliance Monitoring Strategy Policy. All applicable data is entered into ICIS in a timely manner.

- 2. Resolve violations of any rule for which EPA has delegated authority to the state or local agency. Federally Reportable Violations should be reported to ICIS-Air in accordance with the Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources revised and reissued on September 23, 2014.**

All violations are addressed in a timely manner. FRVs are reported, as appropriate, to ICIS.

- 3. Inspect 25% of all NESHAP asbestos demolition/renovation projects. These projects should be selected so that all removal contractors are inspected at least once. Alternatively, lower inspection rates can be negotiated if an effective contractor certification program is in place. Lower inspection rates can also be negotiated if a non-notifier strategy is developed and implemented.**

PCD inspected more than 25% of the regulated asbestos projects in FY 2019.

- 4. Observe asbestos work practices in progress whenever possible to assess compliance. Special priority will be given to entering a project of a contractor with a work practice violation within the previous 12-month period.**

PCD observes abatement projects in progress when possible. Special priority is given to contractors with an enforcement history.

- 5. ACTS/NARS database is no longer available. Report the following asbestos NESHAP activities at least forty-five (45) days after each fiscal six-month period.**
 - a. Number of notifications received;**
 - b. Number of inspections;**
 - c. Non-notifier activity if applicable;**
 - d. Number of non-penalty enforcement actions;**
 - e. Number of enforcement actions with an assessed penalty; and**
 - f. Total penalty assessment.**

Asbestos reports are submitted to EPA on a semi-annual basis.

6. **Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitor, protective equipment, and training as minimum requirements. Alternatively, implement EPA's "Health and Safety Guidelines for EPA Asbestos Inspectors," dated March 1991. These documents will be reviewed by EPA during state program visits.**

Asbestos inspectors are provided with baseline and annual medical screenings. Inspectors have all of the personal protective equipment necessary to perform their job duties.

7. **Recommend (where appropriate) cases and provided support to the EPA Criminal Enforcement Program.**

PCD has worked with Special Agent Billy Jurison with EPA's Criminal Investigation Division on asbestos-related matters. No cases were referred in FY 2019.

Cross Cutting Issues

Goals: Deliver real results to provide Americans with clean air, land, and water; Rebalance the power between Washington and the states to create tangible environmental results for the American people; and Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law.

Objective: See all objectives listed in this agreement.

FY 2019 105 Grant Commitments:

Emission Inventories – Hazardous Air Pollutants

1. **Review 2011 National Air Toxic Assessment (NATA) results during the year the EPA Office of Air Quality Planning and Standards (OAQPS) requests it and make revisions to your agency's inventory. Support the Emission Inventory System (EIS) in reporting the 2017 National Emissions Inventory (NEI) for hazardous air pollutants. The EPA requests that state, local, and tribal air agencies submit emissions information updates for major point sources to EIS database annually or as requested by the EPA Office of Air Quality Planning and Standards. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. The state and local NEI/NATA contact in the Air Data and Analysis Section should be notified via e-mail when the 2017 submittal is made to EIS.**

PCD reviews NATA, as needed, and supports the EIS by submitting the appropriate inventory.

Emission Inventories – Criteria Air Pollutants

2. **Develop and submit to EPA, emission inventory information for all applicable point sources, criteria air pollutants (CAP) and time frames consistent with the Air Emissions Reporting Requirements (AERR) Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The 2017 CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway no later than January 15, 2019. Early submittals are recommended. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2017 submittal is made to the EIS.**

See FY2018 report.

Planning

3. **Submit a draft Air Planning Agreement for FY2018 by November 17, 2017, respectively, by responding to the commitments on the internet-based draft workplan.**

PCD submitted an Air Planning Agreement for FY2019, responding to the commitments on the internet-based draft workplan.

4. **Participate with EPA in an end of year evaluation of performance to be completed by March 1, 2020. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:**
 - a. **Discussions of accomplishments as measured against work plan commitments;**
 - b. **Discussions of the cumulative effectiveness of the work performed under all work plan components;**
 - c. **Discussions of existing and potential problem areas;**
 - d. **Suggestions for improvement, including, where feasible, schedules for making improvements; and**
 - e. **Discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations.**

PCD will participate with EPA in the end of year evaluation to be completed by March 1, 2019.

5. Enter Agency's expectations of EPA (i.e., assistance needed from EPA to meet the commitments under this Air Planning Agreement).

N/A