



**Region 4 - Air Planning Agreement  
For Fiscal Year 2020  
\*\* Final \*\***

**Agency: Chattanooga-Hamilton County Air Pollution Control Bureau  
View Portions of the Workplan**

# Improving Air Quality

**Goal: Goal 1: Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety.**

**Objective: Improve Air Quality: 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.**

**Sub-Objective:** By September 30, 2022, reduce the number of nonattainment areas to 101.

**Strategic Targets:** • TBD

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## FY 2020 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.  
Response: Yes
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.  
Response: Yes. We consistently work with the state in this matter.

### 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 Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Available Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC).  
Response: Yes
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.  
Response: Yes

### Ambient Air Monitoring

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).

Response: Yes

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.

Response: Yes

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 Parts 50, 53, and 58. State agencies, as applicable, will coordinate with their Local agencies in the development of this plan. The network plan is to be submitted on or before 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."

Response: Yes

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 [R4QMP@epa.gov](mailto:R4QMP@epa.gov) or in hard copy to: EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Regional Quality Assurance Manager. 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>.

Response: Yes

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 collection of environmental data. Electronic copies may be submitted to [R4airqa@epa.gov](mailto:R4airqa@epa.gov) and hard copies to: EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Quality Assurance 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](https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf)).

Response: Yes

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 [R4airqa@epa.gov](mailto:R4airqa@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 standard operating procedures (SOPs) associated with the QAPPs. SOPs will be submitted with revised QAPPs and are referenced during the QAPP review; however, SOPs will not be reviewed or approved.

Electronic copies may be submitted to [R4airqa@epa.gov](mailto:R4airqa@epa.gov) and hard copies to: EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Quality Assurance 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](https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf)).

Response: Yes

11. Maintain up-to-date standard operating procedures (SOPs) for instrumentation and quality system processes (e.g., data handling and validation, document control, etc.) in support of criteria pollutant monitoring activities, and as appropriate, any air toxics monitoring activities conducted by your agency. SOPs for newly acquired instrumentation should be developed within 180 days from the start-up of the equipment. Please submit courtesy copies of all SOPs either electronically at [R4airqa@epa.gov](mailto:R4airqa@epa.gov) or by mail to EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Quality Assurance Section Chief.

Response: Yes

12. 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 PM<sub>2.5</sub>. 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).

Response: Yes

13. Comply with the requirements in 40 CFR § 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.)

Response: Yes

14. 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 Web site. The air quality forecast should be submitted daily to the AirNow web site 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.

Response: Yes. Forecast for Chattanooga - Hamilton County is performed by the state.

15. Support staff participation at the following meetings:

- A. The annual Region 4 Ambient Air Monitoring WorkShop; and
- B. The National Ambient Air Monitoring Conference.

Response: Yes. As funding allows.

16. FRM/FEM 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 your EPA monitoring contact by email no more than 90 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA.

Response: Yes

17. 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 (QMPs, QAPPs, and SOPs) for the criteria pollutants network maintained by your agency, and the date that each document was most recently revised and approved (EPA approval only required for QMPs and QAPPs).

Response: Yes

### **Address Air Toxics Problems in Communities**

18. 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, respond to this commitment by stating, "No air toxics monitoring will be performed."

Response: No air toxics monitoring will be performed.

19. 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 should review their QAPPs annually. The review will be documented in an email to [R4airqa@epa.gov](mailto:R4airqa@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 agencies 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 agencies will submit standard operating procedures (SOPs) associated with the QAPPs. SOPs will be submitted with 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."

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Response: No air toxics monitoring will be performed.

20. 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 conduct applicable corrective actions to enhance data quality.

Response: N/A

21. If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 180 days from the end of the quarter for all ambient air toxics monitoring data collected.

Response: N/A

22. As part of the QA competency demonstration submittal (Reporting Requirement 20-14) that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents (QMPs, QAPPs, and SOPs) for the air toxics pollutants network maintained by your agency, and the date that each document was most recently revised and approved (EPA approval only required for QMPs and QAPPs).

Response: Yes

23. 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.

Response: Yes. As appropriate and as funding and staffing permit.

24. 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.

Response: Yes. When appropriate.

25. 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)).

Response: Yes

26. 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).

Response: Yes. Currently there are no sources subject to such rules within our jurisdiction.

# Monitoring and Enforcement

**Goal: Goal 2 – Cooperative Federalism: Rebalance the power between Washington and the states to create tangible environmental results for the American people.**

**Goal 3 - Rule of Law and Process: Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law.**

**Objective: Objective 2.1 – Enhance Shared Accountability: Improve environmental protection through shared governance and enhanced collaboration with state, tribal, local, and federal partners using the full range of compliance assurance tools.**

**Objective 3.1 - Compliance with the Law: Timely enforce environmental laws to increase compliance rates and promote cleanup of contaminated sites through the use of all of EPA's compliance assurance tools, especially enforcement actions to address environmental violations.**

**Sub-Objective:**

- **By September 30, 2022, increase the number of grant commitments achieved by states, tribes, and local communities.**
- **By September 30, 2022, increase the use of alternative shared governance approaches to address state, tribal, and local community reviews.**
- **By September 30, 2022, reduce the average time from violation identification to correction.**
- **By September 30, 2022, increase environmental law compliance rate.**

**Strategic Targets:** • TBD

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## FY 2020 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 (ICIS-Air).

Response: Yes

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.

Response: Yes

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.

Response: Yes

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.

Response: Yes. We will request the assistance of EPA Region 4 if the Bureau's Director deems it necessary to enter a containment area to evaluate compliance.

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 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non-penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment.

Response: Yes

6. Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitoring, 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.

Response: Yes. Health evaluations are provided for Inspectors at the City Wellness Center.

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

Response: Yes

# Cross Cutting Issues

**Goal: Goals 1, 2 and 3: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety; 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.

**Sub-Objective:** See all strategic targets listed in this agreement.

**Strategic Targets:** • See all strategic targets listed in this agreement.

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## FY 2020 105 Grant Commitments:

### Emission Inventories - Hazardous Air Pollutants

1. Review the 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. Report hazardous air pollutants to the National Emissions Inventory (NEI) through the Emission Inventory System (EIS) when criteria air pollutants are reported. 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 OAQPS. Information on the EIS Gateway can be found at: <https://www.epa.gov/air-emissions-inventories>. The state and local NEI/NATA contact in the Air Data and Analysis Section should be notified via e-mail when a submittal is made to the EIS.

Response: Yes. We will continue to submit all available HAP emissions information.

### Emission Inventories - Criteria Air Pollutants

2. Develop and submit to EPA, emissions 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 CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway. Early submittals are recommended. Information on the EIS Gateway can be found at: <https://www.epa.gov/air-emissions-inventories>. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when a submittal is made to the EIS.

Response: Yes

### Planning

3. Submit a draft Air Planning Agreement for FY 2020 by August 1, 2019, respectively, by responding to the commitments on the internet-based draft workplan at <https://www3.epa.gov/cgi-bin/state.cgi>.

Response: Yes

4. Participate with EPA in an end of year evaluation of performance to be completed by March 1, 2021. 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.

Response: Yes

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

Response: The Agency expects additional funding to employ additional personnel in order to better meet the numerous program requirements in the face of increasing workloads and costs.

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