

Region 4 - Air Planning Agreement For Fiscal Year 2020 ** Final ** Mid-Year Review Phase

Agency: Knox County Department of Air Pollution Management 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

FY 2020 105 Grant Commitments:

Implement the Lead NAAQS

1. As appropriate, address any area violating the 2008 Lead NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office.

Response: Yes

Last EPA Reviewer: afebresm - 13:40:11 on 05/06/20 - afebresm -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

NAAQS Cross Cutting

2. 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

Last EPA Reviewer: afebresm - 13:40:15 on 05/06/20 - afebresm -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

3. 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

<u>Last EPA Reviewer</u>: afebresm - 13:40:19 on 05/06/20 - afebresm -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

Implement Mobile Source Programs

4. Actively participate in the transportation conformity process, which includes the following activities: consult with appropriate transportation and air quality partners on development of motor vehicle emissions budgets; participate in the interagency consultation process; and develop relationships with transportation partners.

Response: Yes

<u>Last EPA Reviewer</u>: dmyers01 - 15:00:10 on 05/12/20 - dsmith -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

Implement NSR Programs

5. 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

<u>Last EPA Reviewer</u>: lshepa03 - 15:45:12 on 05/05/20 - eland -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

6. 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

<u>Last EPA Reviewer</u>: lshepa03 - 16:06:47 on 05/05/20 - eland -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

Ambient Air Monitoring

7. 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

<u>Last EPA Reviewer</u>: swaterso - 08:21:46 on 04/30/20 - swaterso -

Negotiation Status: Status_OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

8. 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

<u>Last EPA Reviewer</u>: rguillot - 13:17:58 on 04/28/20 - rguillot - rguillot

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

9. 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

<u>Last EPA Reviewer</u>: swaterso - 08:21:58 on 04/30/20 - swaterso -

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

10. 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 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

<u>Last EPA Reviewer</u>: rguillot - 13:45:49 on 04/28/20 - rguillot - rguillot

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

11. 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 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).

Response: Yes

<u>Last EPA Reviewer</u>: rguillot - 14:49:55 on 04/28/20 - rguillot -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

- 12. 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. 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 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.

Response: Yes

<u>Last EPA Reviewer</u>: rguillot - 13:56:28 on 04/28/20 - rguillot - rguillot

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

13. 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 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

<u>Last EPA Reviewer</u>: rguillot - 14:01:18 on 04/28/20 - rguillot - rguillot

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

14. 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_{2.5}. 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). Response: Yes

<u>Last EPA Reviewer</u>: swaterso - 08:50:57 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

15. 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

<u>Last EPA Reviewer</u>: swaterso - 08:51:39 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

16. 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

Last EPA Reviewer: swaterso - 08:51:49 on 04/30/20 - swaterso -

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

17. 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

<u>Last EPA Reviewer</u>: swaterso - 08:52:03 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

18. 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

<u>Last EPA Reviewer</u>: swaterso - 08:54:17 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

19. 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

<u>Last EPA Reviewer</u>: swaterso - 08:54:28 on 04/30/20 - swaterso -

Negotiation Status: Status_OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

Address Air Toxics Problems in Communities

20. 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

Last EPA Reviewer: swaterso - 08:54:36 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

- 21. 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. 1. The State and/or local agencies should review their QAPPs annually. The review will be documented in an email to 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."

Electronic copies may be submitted to <u>R4airqa@epa.gov</u>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.

Response: No air toxics monitoring will be performed

<u>Last EPA Reviewer</u>: rguillot - 14:09:07 on 04/28/20 - rguillot - swaterso

Negotiation Status: Status_OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

22. 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

<u>Last EPA Reviewer</u>: swaterso - 08:54:47 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

23. 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

Last EPA Reviewer: swaterso - 08:54:56 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

24. 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: N/A

<u>Last EPA Reviewer</u>: swaterso - 08:55:06 on 04/30/20 - swaterso -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

25. 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

<u>Last EPA Reviewer</u>: kforney - 09:52:33 on 05/12/20 - mbloeth -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

26. 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

<u>Last EPA Reviewer</u>: kforney - 09:57:53 on 05/12/20 - mbloeth -

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

27. 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

<u>Last EPA Reviewer</u>: kforney - 10:01:49 on 05/12/20 - mbloeth -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

28. 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

<u>Last EPA Reviewer</u>: kforney - 10:08:25 on 05/12/20 - mbloeth -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

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

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

<u>Last EPA Reviewer</u>: cgala - 00:08:29 on 05/14/20 - cgala -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

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

<u>Last EPA Reviewer</u>: cgala - 00:08:45 on 05/14/20 - cgala -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

Regional Staff Response:

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

<u>Last EPA Reviewer</u>: pmcilvai - 18:00:44 on 05/11/20 - pmcilvai -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

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

<u>Last EPA Reviewer</u>: pmcilvai - 18:00:57 on 05/11/20 - pmcilvai -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

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

<u>Last EPA Reviewer</u>: pmcilvai - 18:01:12 on 05/11/20 - pmcilvai -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

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

<u>Last EPA Reviewer</u>: pmcilvai - 18:01:31 on 05/11/20 - pmcilvai -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

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

Response: Yes

<u>Last EPA Reviewer</u>: cgala - 00:09:13 on 05/14/20 - cgala -

Negotiation Comments:

<u>Current Status</u>: Status_OK

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.

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

<u>Last EPA Reviewer</u>: rwong02 - 11:38:09 on 05/12/20 - rwong02 -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

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

<u>Last EPA Reviewer</u>: rwong02 - 11:38:16 on 05/12/20 - rwong02 -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status_OK

Regional Staff Response:

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

Last EPA Reviewer: ggraf - 11:29:37 on 04/28/20 - ggraf -

Negotiation Status: Status OK

Negotiation Comments:

<u>Current Status</u>: Status OK

- 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

<u>Last EPA Reviewer</u>: ggraf - 11:29:43 on 04/28/20 - ggraf -

Negotiation Status: Status OK

Negotiation Comments:

Current Status: Status OK

Regional Staff Response:

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

<u>Response</u>: EPA provide adequate funding the timely guidance for KCDAQM to meet these commitments.

Last EPA Reviewer: ---

Negotiation Status:

Negotiation Comments:

Current Status: