

**Delaware  
Division of  
Air Quality**

**2013**

**Air Toxics Strategic Plan**

**Mid-year Status**

**(January through June 2013)**

**Summary Report**

**Delaware**  
**Division of Air Quality**  
**2013 Air Toxics Strategic Plan**

**The Air Toxics Strategic Plan (ATSP) is a five-year plan of activities to be undertaken by Division of Air Quality (DAQ) and its partners to reduce the risk of adverse health effects caused by the inhalation of air toxics. The 2013 - 2017 ATSP, finalized on December 31, 2012, was organized within the following components.**

- 1. Implement appropriate actions to reduce the harm from exposure to air toxics**
- 2. Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**
- 3. Identify options for reducing air toxics in the environment**
- 4. Build a greater understanding of ambient air toxics in the environment**
- 5. Identify the potential harm from exposure to air toxics**
- 6. Gather information related to air toxics sources**
- 7. Implement and grow an ongoing program to address the risks from exposure to air toxics**
- 8. Enhance DAQ Air Toxics Resources**

## ACRONYMS

<b>AERMOD</b>	<b>An EPA Dispersion Model</b>
<b>Cal-LEV III</b>	<b>California's Super Ultra Low-Emission Vehicle Program</b>
<b>CO<sub>2</sub></b>	<b>Carbon Dioxide</b>
<b>DAQ</b>	<b>Division of Air Quality</b>
<b>DelDOT</b>	<b>Delaware Department of Transportation</b>
<b>DELJIS</b>	<b>Delaware Criminal Justice Information System</b>
<b>DEN</b>	<b>Delaware Environmental Navigator</b>
<b>DNREC</b>	<b>Department of Natural Resources and Environmental Control</b>
<b>GACT</b>	<b>Generally Available Control Technology</b>
<b>EPA</b>	<b>U. S. Environmental Protection Agency</b>
<b>HAPs</b>	<b>Hazardous Air Pollutants, as defined in Section 112(b) of the 1990 Amendments to the Clean Air Act</b>
<b>I/M</b>	<b>Inspection and Maintenance</b>
<b>MACT</b>	<b>Maximum Achievable Control Technology</b>
<b>NACAA</b>	<b>National Association of Clean Air Agencies</b>
<b>NESCAUM</b>	<b>Northeast States for Coordinated Air Use Management</b>
<b>VOC-RACT</b>	<b>Volatile Organic Compound – Reasonably Available Control Technology</b>
<b>WILMAPCO</b>	<b>Wilmington Area Planning Council</b>

# **2013 Air Toxics Strategic Plan – Mid-year Status – Summary Report**

## **1. Implement appropriate actions to reduce the harm from exposure to air toxics**

### **a. Key Accomplishments**

- i. Completed 37 diesel retrofits of DelDOT heavy-duty trucks in June.
- ii. Responded to four incidences of improperly disposed asbestos containing waste; initiated and coordinated proper disposal. (Ongoing activity)
- iii. Took enforcement actions against two gasoline dispensing facilities for non-compliant Stage II operation.
- iv. Incorporated recently adopted lead acid battery manufacturing requirements of Section 11 of 7 DE Admin. Code 1138 into Johnson Control's operating permit dated January 8.
- v. Incorporated auto-body repair shop requirements of Section 15 of 7 DE Admin. Code 1138 into the operating permit for one newly opened facility.
- vi. Issued 89 approved open burning notifications.
- vii. Amended 7 DE Admin. Code 1147 on March 1 to include petroleum refineries in the CO<sub>2</sub> Budget Trading Program, which is designed to stabilize and then reduce anthropogenic emissions of CO<sub>2</sub>; such reductions would also reduced air toxics emissions.
- viii. Submitted delegation request package to EPA Region 3 on January 30 for the newly adopted area source standard under Section 17 of 7 DE Admin. Code 1138 that is applicable to prepared animal feeds manufacturing operations.

### **b. Significant Current Activities**

- i. Began to incorporate the recently adopted residual risk requirements in Section 8 of 7 DE Admin. Code 1138 into the draft renewal Title V permit for HandyTube Corp. (Est. completion – 4Q13)
- ii. Continued to review and approve, if appropriate, gasoline dispensing facility's Stage I and Stage II permit applications. (Ongoing activity)
- iii. Continued to provide assistance consistent with the Compliance Assistance Oversight Plan to the following:
  1. Perchloroethylene dry cleaning facilities (21). (Ongoing activity).
  2. Auto-body repair shops (46). (Ongoing activity).
  3. Gasoline delivery vessel fleets owners. (Ongoing activity).

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## **1. Implement appropriate actions to reduce the harm from exposure to air toxics**

### **b. Significant Current Activities - Continued**

- iv. Continued to provide the public and regulated community with pertinent and timely information, including compliance assistance tools, associated with DAQ's regulatory development activities, including . . .
  - 1. Amendment to Section 6 of 7 DE Admin. Code 1138 to add the residual risk requirements of Federal Subpart N applicable to facilities that perform chromium electroplating and anodizing operations. Public hearing conducted on June 27. (Est. completion – 4Q13)
  - 2. Amendment to Section 10 of 7 DE Admin. Code 1138 to add recent federal changes to Federal Subpart WWWWWW applicable to facilities that perform non-chromium electroplating and polishing operations. Public hearing conducted on June 27. (Est. completion – 4Q13)
  - 3. Amendment to 7 DE Admin. Code 1140 to include Cal-LEV III requirements. (Est. completion – 4Q13)
- v. Began working with the new Small Business Ombudsman to redefine and expand the existing asbestos program that targets its outreach to the public, certified contractors, professional service firms and government agencies. (Ongoing activity)
- vi. Began working with the Delaware Fire Service to develop a new program to educate fire fighters and property owners on the open burning restrictions. (Ongoing activity)
- vii. Continued working with the Air Quality Partnership on the character branding project to communicate an air quality message targeted to elementary school students. (Ongoing activity)
- viii. Provided outreach support for the DAQ State Fair outreach program, which developed new educational materials and exhibits that encouraged the use of hybrid cars and illustrated the benefits of trip chaining. (Est. completion – 7/28/13)
- ix. DAQ commenced major reorganization and redesign of the Division's web sites, including air toxics, mobile sources, stationary sources and area sources. Webpage content is being changed and improved during this migration process. (Ongoing activity)

### **c. Pending**

- i. The expanded use of auxiliary power sources for Trinity Trucking is on hold pending the identification of funding. (Est. completion – Unknown)
- ii. Development of a communication plan to educate the public on emissions from mobile sources and the impacts of those emissions is on hold due to limited resources. (Est. completion – Unknown)
- iii. Began working with the Division of Energy and Climate to develop a program to promote the deployment of zero emission vehicles. (Est. completion – Unknown, as assignable resources are limited)

## **2. Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

### **a. Key Accomplishments**

- i. Updated the Environmental Navigator system to identify gasoline dispensing facilities that failed to notify the Department of completion of annual testing.

### **b. Significant Current Activities**

- i. Completed three [of four scheduled for 2013] full compliance evaluations at facilities subject to major source HAPs standards (i.e., MACT and residual risk standards). All three sources were found to be in compliance with the major source HAPs standards. (Est. completion – 9/13)
- ii. Completed two [of 16 scheduled for 2013] full compliance evaluations at facilities subject to area source HAPs standards (i.e., GACT standards). Both sources were found to be in compliance with the area source HAPs standards. (Est. completion – 9/13)
- iii. Completed 14 [of 36 scheduled for 2013] compliance evaluations at perchloroethylene dry cleaning facilities (~20% of known facilities). (Est. completion – 9/13)
- iv. Completed 10 [of 78 scheduled for 2013] compliance evaluations at auto-body repair shops (~6% of known facilities). (Est. completion – 9/13)
- v. Completed 76 inspections at regulated gasoline dispensing facilities (~22% of known facilities). Two enforcement actions were taken for non-compliance. (Est. completion – 12/13)
- vi. Tracked 184 vapor recovery system tests at 171 regulated gasoline dispensing facilities (~50% of known facilities). (Est. completion – 12/13)
- vii. Completed 22 perceptible leak tests on gasoline delivery vessels (~4% of known delivery vessels). All gasoline delivery vessels were found to be in compliance. (Est. completion – 9/13)
- viii. Completed 297 site inspections at asbestos demolition sites. (Est. completion – 12/13)
- ix. Completed 2172 surveys of statewide park and ride lots; identified and reported 217 of 18,284 vehicles had expired vehicle tags (~1.2% of all surveyed vehicles). (Est. completion – 12/13)
- x. Completed semi-monthly audits of the Division of Motor Vehicle's inspection and maintenance (I/M) program during this period and completed the initial draft of the annual I/M report in June. (Est. completion – 7/13)
- xi. Continued to monitor air toxics at the Wilmington [carbonyls, metals, and volatile HAPs] and the Delaware City [volatile HAPs] monitoring stations. These air toxics monitoring data enhance our knowledge of the changes in the ambient concentrations of air toxics over time. (Ongoing activity)
- xii. Continued to provide compliance assistance to gasoline delivery vessel fleet owners in meeting annual vapor-tightness testing and permitting requirements. (Ongoing activity)

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## **3. Identify options for reducing air toxics in the environment**

### **a. Key Accomplishments**

- i. Determined that the use of DELJIS data was at least as effective and required significantly less manpower than the continued surveillance of park and ride lots. The Start Action Notice to revise the State Implementation Plan to allow utilization of the DELJIS data was approved on June 6.
- ii. Submitted 2013 Diesel Emissions Reduction Act (DERA) grant application on May 31.

### **b. Significant Current Activities**

- i. Continued working with other organizations to identify air quality problems, develop strategies, and implement Delaware solutions, as follows:
  1. Participated on internal, local, and NACAA air toxics committees. (Ongoing activity)
  2. Participated on internal, local, regional, and national greenhouse gas initiatives, such as the Regional Greenhouse Gas Initiative, etc. (Ongoing activity)
  3. Participated on Mid Atlantic Diesel Collaborative (MADC) projects through conference calls and MADC-sponsored webinars. (Ongoing activity)
  4. Participated at monthly WILMAPCO meetings for New Castle County and biannual workgroup meetings for Kent and Sussex Counties providing the Department's priorities on funding projects. (Ongoing activity)
  5. Participated on the Claymont Coalition and participated on the Claymont Dust Study. (Ongoing activity)
  6. Supported the Transportation & Climate Initiative. (Ongoing activity)
  7. Supported DAQ's Planning Branch efforts on phasing out of Stage II requirements at regulated gasoline dispensing facilities (GDFs) by providing demographic information on Delaware GDFs and cost information for the conversion and decommissioning of Stage II systems. (Ongoing activity)
- ii. Continued to promote transit oriented design through review and providing comment on Preliminary Land Use Service (PLUS) applications. (Ongoing activity)

### **c. Pending**

- i. Continue to follow Ozone Transport Commission model rule development for aftermarket catalytic converters and medium duty- and heavy duty-diesel inspection and maintenance programs. (Implementation is currently on hold due to lack of assignable resources)
- ii. The reevaluation of the Smoking Vehicle Reduction Program continued to be on-hold in 2013 due to lack of funding and assignable resources.

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### **4. Build greater understanding of ambient air toxics in the environment**

#### **a. Key Accomplishments**

- i. Continued to monitor air toxics at the Wilmington [carbonyls, metals, and volatile HAPs] and the Delaware City [volatile HAPs] monitoring stations. All validated results were submitted to the EPA. (Ongoing activity)
- ii. Completed the installation of the Upper Air Profiler in March and the installation of the meteorological tower in May in Lewes; this project will provide meteorological data to University of Delaware and NOAA.

#### **b. Significant Current Activities**

- i. Nearly completed the equipping and testing of a moveable monitoring platform for measuring concentration of pollutants at locations other than the DAQ's stationary monitoring stations. (Exp. completion – 8/13)
- ii. The monitoring phase of the remote sensing study was completed on June 18; the report on the study results is under development. (Exp. Completion – 3Q13)

#### **c. Pending**

- i. Continued a special air toxics monitoring project at the Delaware City monitoring station. (Subsequently, this project was cancelled in August due to equipment malfunctions.)
- ii. The 2013 community air toxics (methyl bromide) monitoring project around the Port of Wilmington was cancelled due to the lack of funding.
- iii. Funding needed to provide the new moveable monitoring platform with air toxics monitoring capabilities has not been identified.

### **5. Identify the potential harm from exposure to air toxics**

#### **a. Key Accomplishments**

- i. Provided Engineering & Compliance Branch with potential health impact data due to emissions associated with a methyl bromide fumigation operations.

#### **b. Significant Current Activities**

- i. Performed risk screenings prior to issuance of new and revised air permits. All screen results were below the threshold for conducting more sophisticated risk assessment, such as AERMOD. (Ongoing activity)

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## **6. Gather information related to air toxics sources**

### **a. Significant Current Activities**

- i. Submitted the Underground Storage Tanks (UST) Semiannual Activities Report, which included gasoline dispensing facilities, to EPA in April. (Est. completion – 10/13)
- ii. Made significant progress in populating DEN database with new and previously unpermitted dry cleaners, auto-body repair shops, and gasoline delivery vessel owners. (Ongoing activity)
- iii. Continued to incorporate new notifications and to maintain existing active sites in the Delaware Online Asbestos Notification System (DOANS). (Ongoing activity)

## **7. Implement an ongoing program to address the risks from exposure to air toxics**

### **a. Key Accomplishments**

- i. Issued the Year-End Status Report for DAQ's 2012 Air Toxics Strategic Plan on March 21. This report provided year-end status of each air toxics-related activity undertaken in 2012 and summarized the key accomplishments of 2012, as well as, identify significant 2012 activities continuing into 2013.

### **b. Significant Current Activities**

- i. Commenced to build the infrastructure to implement DAQ's risk-based process to mitigate unacceptable air toxics impacts by
  1. Acquiring a moveable monitoring platform. (Complete)
  2. Acquiring monitoring equipment and supporting fixtures for future monitoring projects. (Completed on March 13 for non-air toxics monitoring projects; acquisition of equipment for air toxics monitoring projects is on hold due to lack of funding for needed monitoring equipment)
  3. Installing and testing of the monitoring equipment and supporting fixtures. (Completed on June 30 for non-air toxics monitoring projects; installation of air toxics monitoring equipment is on hold due to lack of funding)
- ii. Continued to actively participate on NACAA's air toxics, emissions inventory, monitoring, mobile source, and outreach committee programs. (Ongoing activity)

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### **7. Implement an ongoing program to address the risks from exposure to air toxics**

#### **b. Significant Current Activities**

- iii. Continued to actively participate in regional and national programs, including the following, to identify greenhouse gas issues, develop strategies, and identify Delaware solutions. (Ongoing activities)
  - 1. Regional Greenhouse Gas Initiative.
  - 2. Transportation & Climate Initiative
  - 3. North America 2050 Partnership
  - 4. Clean Cities/States Program (Alternative Fuels)
  - 5. Clean Fuel Standard
  - 6. NESCAUM Low Emission Vehicle Workgroup

### **8. Air toxics resources development**

#### **a. Significant Current Activities**

- i. Continued to implement a cooperative arrangement with DNREC's Groundwater Discharge Section to share results and information gathered during each program's inspections of auto-body repair shops.

#### **b. Pending**

- i. Presentation on a recently developed air toxics training program for permit writers covering Section 14 of 7 DE Admin. Code 1138 and related VOC-RACT requirements in 7 DE Admin. Code 1124 that is applicable to sources that spray-applied surface coatings to miscellaneous parts and products is on hold pending availability and scheduling logistics. (Est. completion – Unknown)