

**Delaware
Division of
Air Quality**

2012

Air Toxics Strategic Plan

Mid-year Status
(January through June 2012)

Summary Report

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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 2012 - 2016 ATSP, finalized on December 28, 2011, is organized within the following components.

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

ACRONYMS

ATSP	Air Toxics Strategic Plan
DAQ	Division of Air Quality
DelDOT	Delaware Department of Transportation
DNREC	Department of Natural Resources and Environmental Control
GACT	Generally Available Control Technology
EPA	U. S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants, as defined in Section 112(b) of the 1990 Amendments to the Clean Air Act
MACT	Maximum Achievable Control Technology
NACAA	National Association of Clean Air Agencies
TCI	Transportation & Climate Initiative
WILMAPCO	Wilmington Area Planning Council

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

a. Key Accomplishments

- i. Completed three [of 4 scheduled for 2012] full compliance evaluations at facilities subject to major HAPs source standards (i.e., MACT and residual risk standards).
- ii. Completed 14 [of 20 scheduled for 2012] compliance evaluations at perchloroethylene dry cleaning facilities.
- iii. Completed 78 [of 40 scheduled for 2012] compliance evaluations at auto-body shops.
- iv. Completed 53 [of 116 scheduled for 2012] inspections at regulated gasoline dispensing facilities.
- v. Tracked 168 [of 348 scheduled for 2012] vapor recovery tests at regulated gasoline dispensing facilities.
- vi. Completed 51 [of 60 scheduled for 2012] perceptible leak tests on gasoline delivery vessels.
- vii. Completed 230 site inspections at asbestos demolition sites.
- viii. Completed semi-monthly audits of the Division of Motor Vehicle's inspection and maintenance (I/M) program.
- ix. Developed, together with the Air Quality Partnership, a skit targeted towards children on the importance of understanding air quality and steps to take to fight air pollution.
- x. Conducted the 2012 Ozone Season Kick-Off outreach in collaboration with the Air Quality Partnership and Delaware Nature Society on 4/21, which in addition to other educational material included the recently developed children's skit (see item 1.a.xi.).
- xi. Conducted outreach program on 5/4 associated with the opening of 20 newly installed electrical outlets for refrigerated truck at the Trinity Port Service facility; this electrification project replaced the previously used diesel generators.
- xii. Revised and customized mobile source emission/impacts educational information for high school students and incorporated the updated information into the 2012 Envirothon held on 4/28/12.
- xiii. Published an open burning educational article "Dioxins in My Back Yard?" in the June 2012 Environmental Protection Matters.
- xiv. Submitted delegation request package to EPA Region 3 on March 23 for the newly adopted residual risk requirements under Section 8 of Regulation 1138 that is applicable to facilities that conduct halogenated solvent cleaning operations.

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

b. Significant Current Activities

- i. Completed eight [of 19 scheduled for 2012-2013] full compliance evaluations at facilities subject to area HAPs source standards (i.e., MACT and GACT standards). (Est. completion – 9/13)
- ii. Continued the adoption of Section 17 of Regulation 1138 to add the area source requirements similar to Federal Subpart DDDDDDD that would be applicable to prepared feeds manufacturing facilities. (Est. completion – 4Q12)
- iii. Began repeal of Section 29 of Regulation 1120 that is applicable to existing hospital, medical, and infectious waste incinerator. The repeal is appropriate since all applicable sources have been shut down and dismantled. (Est. completion – 4Q12)
- iv. Began preparation of air permits for 21 newly uncovered existing facilities that are subject to area source requirements under Section 5 (6 - perchloroethylene dry cleaners) and Section 15 (15 - auto-body shops). (Ongoing activity)
- v. Continued to provide the public and regulated community with pertinent and timely information, including compliance assistance tools, associated with DAQ's air toxics regulatory development activities, including . . .
 1. Amending Section 8 of Regulation 1138 to add the residual risk requirements of Federal Subpart T applicable to facilities that conduct halogenated solvent cleaning. (Complete)
 2. Adopting Section 17 of Regulation 1138 to add the area source requirements of Federal Subpart DDDDDDD applicable to prepared feeds manufacturing facilities. (Est. completion – 4Q/12)
 3. Repealing Section 29 of Regulation 1120 applicable to existing hospital, medical, and infectious waste incinerators. (Est. completion – 4Q/12)
- vi. Began the fourth (and final) heavy-duty diesel engine replacement for the Port of Wilmington project. (Est. completion – 9/12)
- vii. Began the engine replacement for Wilmington Tug's diesel engine repowering project. (Est. completion – 9/12)
- viii. Identified 50 DeIDOT trucks that will be equipped with diesel retrofit installations (diesel particulate filter and diesel organic catalyst). (Est. completion – 9/12)
- ix. Began preparing a new diesel anti-idling outreach presentation (display and information) to be incorporated with DNREC's "Connect the Dots" exhibit at the Delaware State Fair in July. (Est. completion – 7/12)
- x. Began coordinating air quality activities as part as the DNREC "Connect the Dots" exhibit at the Delaware State Fair in July; which includes DAQ's newly developed diesel anti-idling display. (Est. completion – 7/12)

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

b. Significant Current Activities - continued

- xi. Continued to provide information and compliance assistance on air toxics and other DNREC regulatory requirements for small business through the Regulatory Advisory Service. (Ongoing activity)
- xii. Continued to provide compliance assistance in meeting annual testing and permitting requirements to gasoline delivery vessel fleet owners. (Ongoing activity)

2. Implement an ongoing program to address the risks from exposure to air toxics

a. Key Accomplishments

- i. Issued the DAQ's 2011 Air Toxics Strategic Plan Year-End Status Report on March 12. This report summarized the key accomplishments during 2011 and identified the significant ongoing 2011 activities continuing into 2012.

b. Significant Current Activities

- i. Continued to actively participate in the National Association of Clean Air Agency's (NACAA) air toxics, modeling, monitoring, mobile source, and outreach committee programs. (Ongoing activity)
- ii. Continued to actively participate in the National Small Business Assistance program. (Ongoing activity)
- iii. Continued to actively participate in regional and national programs, including the following, to identify greenhouse gas issues, develop strategies and identify Delaware solutions.
 - 1. Regional Greenhouse Gas Initiative. (Ongoing activity)
 - 2. Transportation & Climate Initiative. (Ongoing activity)
 - 3. North America 2050 Partnership. (Ongoing activity)
 - 4. Clean Cities/States Program (Alternative Fuels). (Ongoing activity)
 - 5. Clean Fuel Standard. (Ongoing activity)

3. 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. These air toxics monitoring data enhance our knowledge of air toxics in Delaware's environment. (Ongoing activity)

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3. Build greater understanding of ambient air toxics in the environment

b. Significant Current Activities

- i. Continued to quality assure/quality control the monitoring data collected during the “Community Air Toxics Study” project that utilized a gas chromatographic/mass spectrometer to measure concentrations of multiple hazardous air pollutants (HAPs) at various sites, including schools, in Wilmington. This project will provide insights on the spatial variation of HAP concentrations compared to the existing HAP monitoring results at the Wilmington monitoring station. (Est. completion – 9/12)
- ii. Began planning for a new methyl bromide monitoring project in the communities around the Port of Wilmington. (Exp. completion – 2013)
- iii. Found funding to repair to the upper air profiler and to relocate it to Sussex County for use on a University of Delaware project. (Exp. Completion - 4Q12)
- iv. Began search for funding of an air toxics monitoring project in communities around the Delaware City Refinery. (Exp. Completion - 4Q12)

4. Identify the potential harm from exposure to air toxics

a. Significant Current Activities

- i. Reviewed and performed modeling to support risk-based permit decisions on a permit application from a facility at the Port of Wilmington. (Ongoing activity)

5. Identify options for reducing air toxics in the environment

a. Key Accomplishments

- i. Submitted 2013 Diesel Emissions Reduction Act (DERA) grant application, which was approved in June, but has not yet been funded.
- ii. Completed a project to identify the “Metrics and Best Practices” for quantifying the impacts of climate on land use planning/policies through the Transportation & Climate Initiative’s “Sustainable Communities” workgroup.

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5. Identify options for reducing air toxics in the environment

b. Significant Current Activities

- i. Continued to maintain open communication with the Claymont Community Coalition on air toxics and other issues, such as the Claymont Dust Study. (Ongoing activity)
- ii. Continued to participate at monthly WILMAPCO meetings for New Castle County and biannual workgroup meetings for Kent and Sussex Counties; provided the Department's priorities on funding projects. (Ongoing activity)
- iii. Continue participation on Mid Atlantic Diesel Collaborative (MADC) projects; evaluated and commented on submitted proposals for competitive grants. (Ongoing activity)
- iv. Began Phase 1 of freight study to identify regional freight flows and mitigation measures impacting emissions through the Transportation & Climate Initiative's (TCI) "Freight" workgroup. (Est. completion – 2H12)
- v. Began work with TCI's "Clean Vehicles & Fuels" workgroup and our Clean Cities partners to develop electric vehicle (EV) outreach materials. (Est. completion – 2H12)
- vi. Began development of an "Electric Vehicle APP" for the TCI's "Innovation, Communication & Technologies" workgroup's online "store". (Est. completion – 2H12)
- vii. Continued to review and make significant comments on Preliminary Land Use Service (PLUS) applications. (Ongoing activity)
- viii. Began a research project to document how the programs in the 11 states in the TCI region support sustainable communities. (Est. completion – 2H12)
- ix. Continued to support of DAQ planning efforts on phasing out of Stage 2 requirements at regulated gasoline dispensing facilities. (Ongoing activity)

6. Gather information related to air toxics sources

a. Key Accomplishments

- i. Submitted the Underground Storage Tanks (UST) Semiannual Activities Report to EPA in April 2012.

b. Significant Current Activities

- i. Continued to identify new and previously unpermitted dry cleaners, auto-body shops, and gasoline delivery vessel owners. (Ongoing activity)

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6. Gather information related to air toxics sources

b. Significant Current Activities - continued

- ii. Continued to incorporate new notifications and maintain existing active sites in the Delaware Online Asbestos Notification System. (Ongoing activity)
- iii. Received nearly all stationary point source data needed for the preparation of the 2011 National Emissions Inventory report. (Est. completion - 12/12)

7. Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics

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. These air toxics monitoring data enhance our knowledge of the changes in the ambient concentrations of air toxics over time. (Ongoing activity)
- ii. Conducted compliance assessments of school bus operators with anti-idling requirements of Regulation 1145, Excessive Idling of Heavy Duty Vehicles, at various schools throughout Delaware during the winter and spring periods. The audits indicated a high level of compliance and no major changes in the anti-idling outreach program are indicated. (Ongoing activity)

b. Significant Current Activities

- i. Identified the need for staff training on requirements of Section 14 (air toxics emissions from spray-applied coating operations) of Regulation 1138 during assessment of the permit and compliance evaluation programs. Training program is under development. (Est. completion – 10/12)

8. Air toxics resources development

a. Significant Current Activities

- i. Began development of internal air toxics training program for permit writers covering Section 14 of Regulation 1138 that is applicable to operations that spray-applied surface coatings to miscellaneous parts and products). (Est. completion – 9/12)

b. Pending

- i. Development of an internal air toxics training program for permit writer that facilitates their making applicability determinations for the multitude of area source standards that EPA has adopted over the last several years. (Est. completion – Unknown, limited resources)