

**Delaware  
Air Quality  
Management**

**2008**

**Air Toxics Strategic Plan**

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**Air Quality Management**  
**2008 Air Toxics Strategic Plan**

**The Air Toxics Strategic Plan (ATSP) is a five-year plan of activities to be undertaken by Air Quality Management and its partners to reduce the risk of adverse health effects caused by the inhalation of air toxics. The 2008 ATSP, finalized on January 31, 2008, is organized within the following components.**

- **Implement an on-going program to address the risks from exposure to air toxics**
- **Build a greater understanding of ambient air toxics environment**
- **Identify 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 AQM air toxics resources**

**2008**

# 2008 Air Toxics Strategic Plan

## Year 2008

<b>Implement an on-going program to address the risks from exposure to air toxic</b>
<ul style="list-style-type: none"><li>• Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.</li></ul>
<ul style="list-style-type: none"><li>• Review status and complete year-end status report on the 2007 individual Strategic Plans.</li></ul>
<ul style="list-style-type: none"><li>• Track implementation and report year-end-status of the 2007 Air Toxics Strategic Plan by 3/31/08.</li></ul>
<ul style="list-style-type: none"><li>• Review status and complete mid-year status report on the 2008 individual Strategic Plans.</li></ul>
<ul style="list-style-type: none"><li>• Track implementation and report mid-year status on the 2008 ATSP by 9/30/08.</li></ul>
<ul style="list-style-type: none"><li>• Coordinate the updating of the ATSP for 2009-2013<ul style="list-style-type: none"><li>• Incorporate risk results from the DATAS findings into the preparation and development of the air toxics strategic planning process.</li><li>• Update individual Strategic Plans for 2009-2013.</li><li>• Update and finalize 2009 ATSP for years 2009 to 2013 by 12/31/08.</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.<ul style="list-style-type: none"><li>• Continue to support and participate in the Claymont Industry Partnership Initiative.</li><li>• Participate on the EPA Region 3's newly formed "Area Source Implementation Workgroup".</li><li>• Continue to participate on the NACAA Boiler MACT Workgroup.</li><li>• Continue to search for and implement at least one new opportunity to increase the public awareness of actions that the public can take to reduce their risk from exposure to air toxics, including appropriate P2 programs.</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.<ul style="list-style-type: none"><li>• Participate on the EPA Region 3's newly formed "Area Source Implementation Workgroup".</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify pollution prevention opportunities, develop strategies/solutions, and continue the DE pollution prevention program.<ul style="list-style-type: none"><li>• Clean Marina Program.</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.</li></ul>
<ul style="list-style-type: none"><li>• Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.</li></ul>
<ul style="list-style-type: none"><li>• Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.</li></ul>
<ul style="list-style-type: none"><li>• Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.</li></ul>

## 2008 Air Toxics Strategic Plan

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<b>Build greater understanding of ambient air toxics environment</b>
<ul style="list-style-type: none"> <li>• Determine ambient air toxics concentrations for selected HAPs in Delaware.                             <ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.</li> <li>• Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> </ul> </li> <li>• Continue to support University of Delaware’s special project to provide near real time organic aerosol speciation at MLK monitoring site.</li> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> <li>• Continue to operate the gas chromatographic mass spectrometer to quantify “Community Air Toxics” under EPA air toxics grant.</li> <li>• Undertake new or special monitoring needs that may surface.                             <ul style="list-style-type: none"> <li>• Continue saturation study in Sussex County and issue final report by 4/30/08.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Provide air toxics modeled results (HAP concentrations) based on DATAS Phase II modeling, to support . . .                             <ul style="list-style-type: none"> <li>• Assessment of air toxics health impacts in communities.</li> <li>• Development of control strategies to meet the new air toxics standards.</li> <li>• Assist the air permitting decision-making process by considering cumulative impacts on as needed basis.</li> </ul> </li> </ul>

### Year 2008

<b>Identify potential harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Characterize the cancer and non-cancer risks associated with 2003 modeled results.                             <ul style="list-style-type: none"> <li>• Provide regional-scaled modeling concentrations to DPH for risk assessments.</li> </ul> </li> <li>• Reconcile the DATAS-2003 monitored and modeled concentrations for the five (5) air toxics monitoring sites by 3/31/08.                             <ul style="list-style-type: none"> <li>• Compounds modeled by local-scale modeling by 3/31/08.</li> <li>• Compounds modeled by regional-scale modeling by 3/31/08.</li> </ul> </li> <li>• Complete DATAS-2003 Phase II modeling report by 3/31/08.</li> <li>• Review DATAS Phase II results to determine impacts and prepare responses for anticipated questions concerning stationary sources with the release of the source apportionment information.</li> <li>• Coordinate E&amp;C responses to DATAS results with other AQM branches to ensure consistent responses.</li> </ul>
<ul style="list-style-type: none"> <li>• Characterize the cancer and non-cancer risks through future air toxics assessment programs.                             <ul style="list-style-type: none"> <li>• Coordinate ongoing risk assessment support and guidance of DPH for air toxics risk reduction activities.</li> <li>• Coordinate risk assessments needs and results for model-generated for DATAS Phase II with DPH.</li> </ul> </li> <li>• Following release of DATAS Phase II Report, coordinate a team assessment of the need/value for conducting additional air toxics assessment studies (i.e. monitoring, modeling or both).</li> <li>• Analyze monitoring data from completed special monitoring projects, i.e. AQM/UD, and refine air toxics model, if appropriate.                             <ul style="list-style-type: none"> <li>• Continue analysis of data collected from E-DATAS projects.</li> </ul> </li> <li>• Commence source apportionment analyses for air toxics with special attention to the following by 12/31/08:                             <ul style="list-style-type: none"> <li>• Sources of air toxics of concern.</li> <li>• Contribution of mobile sources versus stationary sources.</li> <li>• Diesel particulate matter.</li> <li>• Residential wood stoves.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to refine air toxics model for characterizing air toxics risks through utilization of applications in Sub-Grid Scale Variability (SGV).</li> <li>• Identify resources and funding needed to implement risk assessment aspect of DATAS-2009, if undertaken.</li> </ul>

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## 2008 Air Toxics Strategic Plan

### Year 2008

<b>Identify potential harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• If decision is made to undertake new modeling using 2005 Emission Inventory                             <ul style="list-style-type: none"> <li>• Identify resources and funding needed to implement modeling.</li> <li>• Acquire needed software and hardware for modeling.</li> <li>• Develop modeling protocol for the implementation.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify and assess alternatives to DPH-provided risk assessments, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement alternative risk assessments, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Review DATAS Phase II findings and assess potential impact of dry cleaning and gasoline distribution air toxics on the public's health.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate review and analysis of 2002 NATA results and facilitate the preparation of DE response, if released by EPA.</li> </ul>

### Year 2008

<b>Gather information related to air toxics sources</b>
<ul style="list-style-type: none"> <li>• Develop emissions inventory protocol for the implementation of the 2008 NEI by 12/08.</li> </ul>
<ul style="list-style-type: none"> <li>• Review and update emissions inventory protocol for the implementation of DATAS-2009, if undertaken.</li> </ul>
<ul style="list-style-type: none"> <li>• Upon completion of air toxics model development and implementation, work with management, modeling, and mobiles sources to better characterize the level of risk contributed by emissions from mobiles sources.</li> </ul>
<ul style="list-style-type: none"> <li>• Complete 2005 HAPs emissions inventory to the extent there is information available by 6/08.</li> </ul>
<ul style="list-style-type: none"> <li>• Commence working on source apportionment with Mohammed Majeed associated with the DATAS Phase II results by 6/08.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue review of emission inventory inputs and/or assumptions for air toxics of concern as indicated by DATAS Phase II modeling and risk assessment results.</li> </ul>
<ul style="list-style-type: none"> <li>• Provide emissions inventory support to the air toxics education and reduction programs, as required.</li> </ul>
<ul style="list-style-type: none"> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> </ul>
<ul style="list-style-type: none"> <li>• Evaluate screening needs and modify the air toxics model to provide a simplified screening tool.</li> </ul>

### Year 2008

<b>Identify options for reducing air toxics in the environment</b>
<ul style="list-style-type: none"> <li>• Develop and begin implementation of a community-based air toxics reduction program.</li> </ul>
<ul style="list-style-type: none"> <li>• Monitor federal activities associated with the establishment of a new Lead NAAQS.</li> </ul>
<ul style="list-style-type: none"> <li>• Maintain open communications with Chamber of Shipping of America and the U.S.C.G. regarding any recent or impending changes in national or international shipping laws that might impact Section 46 of Regulation 1124.</li> </ul>
<ul style="list-style-type: none"> <li>• Review DATAS Phase II results and identify air toxics reduction activities needed to address potential adverse health impacts.</li> </ul>
<ul style="list-style-type: none"> <li>• Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.                             <ul style="list-style-type: none"> <li>• Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.</li> <li>• Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.</li> <li>• Schedule presentation of the mobile source air toxics results following the release of the DATAS Phase II report.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Reassess current contribution to smart growth oversight to encourage consideration of impact of mobile source emissions by 12/31/08.</li> </ul>
<ul style="list-style-type: none"> <li>• If DATAS Phase II identifies mobile source-driven "hot spots", initiate development of a mobile source air toxics reduction or education programs by 12/31/08.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative projects and report status to EPA R3, if appropriate.</li> </ul>

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## 2008 Air Toxics Strategic Plan

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<b>Identify options for reducing air toxics in the environment – cont.</b>
<ul style="list-style-type: none"> <li>• Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.                             <ul style="list-style-type: none"> <li>• Newly proposed amendments to federal MACT or incineration standards.                                     <ul style="list-style-type: none"> <li>• Commercial and Industrial Solid Waster Incinerator Standard.</li> </ul> </li> </ul> </li> <li>• Newly proposed federal residual risk standards, applicable to Delaware. The following were expected to have been proposed in 2007.                             <ul style="list-style-type: none"> <li>• Subpart U (Polymers &amp; Resins – Group 1).</li> <li>• Subpart Y (Marine vessel loading facilities).</li> <li>• Subpart GG (Aerospace coating facilities).</li> </ul> </li> <li>• Newly proposed federal area source standards under Section 112(k).                             <ul style="list-style-type: none"> <li>• 10 yet to be proposed standards (predominately fabricated metal products) are due to be promulgated by June 2008.</li> <li>• 10 other yet to be proposed standards (predominately chemicals manufacturing) are due to be promulgated by December 2008.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.                             <ul style="list-style-type: none"> <li>• As each area source standard is being proposed, evaluate the impacts of pollution prevention implementation in that sector.                                     <ul style="list-style-type: none"> <li>• Paint stripping and miscellaneous coating at area sources (Subpart HHHHHH includes auto body shops).</li> <li>• Electric arc furnace steelmaking facilities at area sources (Subpart YYYYYY) from scrap steel suppliers' perspective.</li> </ul> </li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Determine timing and need for case-by-case MACT determination for PVC MACT (Subpart J).</li> </ul>
<ul style="list-style-type: none"> <li>• Evaluate the need for the development of additional source category permits to address air toxics issues, ongoing.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify grant and funding opportunities.                             <ul style="list-style-type: none"> <li>• Facilitate the identification, preparation and submission for transportation-related grants or other funding.</li> <li>• Continue to identify resources and funding needed to implement air toxics communications and outreach programs.</li> <li>• Work with and promote open communications with other branches, divisions and Departments on energy efficiency/conservation opportunities and pursue funding opportunities for projects.</li> </ul> </li> </ul>

### Year 2008

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Promote the implementation of mobile source air toxics reduction initiatives/programs.                             <ul style="list-style-type: none"> <li>• Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the SmartWay Transport programs, as appropriate.</li> <li>• Continue to monitor the initial DE alternative power unit grantees results.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Insure continued or improved compliance of stationary sources.                             <ul style="list-style-type: none"> <li>• Perform full compliance evaluations at all major and synthetic minor air toxics sources in accordance with the 6/29/07 compliance monitoring plan by 9/30/08.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Perform full compliance evaluations at all non-dry cleaning area air toxics sources during the 2008-9 time period.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Inspect 10% of the of the gasoline delivery vessel for vapor tightness at gasoline bulk terminals.</li> </ul> </li> </ul>

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## 2008 Air Toxics Strategic Plan

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<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Insure continued or improved compliance of stationary sources – continued.</li> </ul>
<ul style="list-style-type: none"> <li>• Finalize and issue revised dry cleaner operating permits containing residual risk requirements.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to implement the dry cleaner compliance assistance program for the residual risk requirements consisting of the following:               <ul style="list-style-type: none"> <li>• Revised AQM Compliance Calendar.</li> <li>• Development of a dry cleaning compliance website.</li> <li>• On-site inspections and consultations.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Incorporating updated MACT requirements in air permits.               <ul style="list-style-type: none"> <li>• Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.</li> <li>• Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 30, as needed.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• As new area source standards are proposed and finalized by EPA, develop listings of affected sources, if appropriate.</li> <li>• Develop a compliance assistance program by 12/31/08 for sources that will be affected by future adoption of the area source paint stripping and coating standard (Subpart HHHHHH) into Reg. 1138.</li> <li>• Provide support, if warranted, during the adoption of the area sources gasoline distribution standard (Subpart BBBB). </li> </ul>
<ul style="list-style-type: none"> <li>• Implement other air toxics-related communications and outreach programs.               <ul style="list-style-type: none"> <li>• Continue to conduct anti-idling outreach programs for schools and the trucking industry and report status to EPA R3, as appropriate.</li> <li>• Implement at least one new opportunity to increase the public awareness of actions that the public can take to reduce their risk exposure to air toxics, including appropriate P2 programs.                   <ul style="list-style-type: none"> <li>• DATAS Phase II Report Release.</li> <li>• Anti-idling education and outreach.</li> </ul> </li> <li>• Implement school environmental programs outreach project. Incorporate anti-idling regulation and other air toxics issues.                   <ul style="list-style-type: none"> <li>• Continue implementation of the <u>Drivers Stop Your Engines</u> outreach program.</li> </ul> </li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting anti-idling for school buses.</li> <li>• Develop and begin to carryout a public outreach associated with the implementation of the enhanced low inspection and maintenance program in Sussex County.</li> <li>• Continue to provide outreach and education support for Area Sources' dry cleaning compliance assistance program.</li> <li>• Continue to participate in community/industrial air toxics outreaches and evaluate new opportunities.               <ul style="list-style-type: none"> <li>• Claymont Coalition.</li> <li>• Claymont Industrial Partnership Initiative.</li> <li>• Explore new outreach opportunities.</li> </ul> </li> <li>• Continue to support Engineering and Compliance's community/industrial air toxics outreach programs.</li> <li>• Implement education and outreach programs associated with the revised open burning requirements by 5/1/08.</li> <li>• Continue to work with other State agencies including DPH on air toxics communications and outreaches.</li> </ul>
<ul style="list-style-type: none"> <li>• Provide support to Small Businesses on air toxics related issues.               <ul style="list-style-type: none"> <li>• Provide assistance to participants of DE-PA-MARAMA auxiliary power unit (APU) grant in finalizing project reports by 5/31/08.</li> <li>• Continue to encourage new participation and to provide assistance to Delaware marinas in obtaining voluntary compliance certification under the Clean Marina program.</li> </ul> </li> </ul>

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## 2008 Air Toxics Strategic Plan

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<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Identify and pursue potential joint opportunities with the industry and other agencies as a possible option to regulatory requirements that will reduce risk from exposure to air toxics. Potential new areas include:               <ul style="list-style-type: none"> <li>• Mercury exchange P2 program.</li> <li>• Claymont Industry Partnership Initiative.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory and P2 programs.               <ul style="list-style-type: none"> <li>• Explore additional auxiliary power unit (APU) opportunities.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to coordinate implementation of area source protocol when area source standards are promulgated.               <ul style="list-style-type: none"> <li>• Two sets of area source standards (20 total are expected) are projected to be promulgated in 2008.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Update and submit to EPA Region 3, if required, the area source plan for adoption, delegation, and/or implementation for existing and newly promulgated area source MACT rules.</li> <li>• Implement a “Smoking Vehicle Reduction Program”.               <ul style="list-style-type: none"> <li>• Continue to maintain diesel emissions opacity instrumentation training program.</li> <li>• Develop and produce outreach materials and program to support baseline testing of smoking vehicle by 12/31/08.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Complete annual I/M report and submit report to EPA R3, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Develop and begin to carryout a public outreach associated with the implementation of the enhanced low inspection and maintenance program in Sussex County.</li> <li>• Assist Brandywine school district with installation of diesel retrofits.</li> <li>• Facilitate the implementation of diesel retrofits.</li> </ul>
<ul style="list-style-type: none"> <li>• Adopt new and amend existing air toxics regulations for mobile and stationary sources.               <ul style="list-style-type: none"> <li>• Adopting new air toxics rules, as identified.                   <ul style="list-style-type: none"> <li>• Adopt new Smoking Vehicle regulation by 12/31/08.</li> <li>• Adopt Delaware applicable area source standards under Section 112(k) into Regulation 38 prior to federal existing source compliance dates.                       <ul style="list-style-type: none"> <li>• Adopt Subpart PPPPPP (Lead Battery Manufacture) by December 31, 2008.</li> <li>• Amend General Provisions (Subpart A) of Regulation 1138 for selective changes in federal requirements by December 31, 2008.</li> <li>• Submit Start Action Notice for Subpart WWWW (Hospital Ethylene Oxide Sterilizers) by December 31, 2008.</li> <li>• Submit Start Action Notice for Subpart YYYYY (Electric Arc Furnaces) by December 31, 2008.</li> <li>• Submit Start Action Notice(s) for Subparts BBBBBB and CCCCCC (Gasoline Distribution Infrastructure/Dispensing) by December 31, 2008.</li> <li>• Submit Start Action Notice for Subpart HHHHHH (Paint Stripping/Auto Body Coating) by December 31, 2008.</li> </ul> </li> </ul> </li> <li>• Amending existing air toxics rules.                   <ul style="list-style-type: none"> <li>• Amend Regulation 31 to expand the low enhanced inspection and maintenance program to include Sussex County by 12/31/08.</li> <li>• Amend Regulation 1141 by updating and adding requirements for Consumer and Commercial Products.                       <ul style="list-style-type: none"> <li>• Amend Regulation 41 by amending Section 2 (Consumer Products) by 9/30/08.</li> <li>• Amend Regulation 41 by adopting a new Section (Adhesives and Sealants) by 9/30/08.</li> </ul> </li> </ul> </li> <li>• Adopt applicable area source residual risk standards into Regulation 38 prior to federal existing source compliance dates.                   <ul style="list-style-type: none"> <li>• Complete amendment of Subpart M (Dry Cleaners) for residual risk standard and title V permitting changes by 5/31/08.</li> <li>• Submit Start Action Notice for Subpart T (Halogenated Solvent Degreasers) by December 31, 2008.</li> </ul> </li> </ul> </li> <li>• As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.</li> <li>• Continue working with AQM to educate Drycleaners about new residual risk standard and changes to the air permits by 9/30/08.</li> </ul>

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## 2008 Air Toxics Strategic Plan

### Year 2008

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Adopt new and amend existing air toxics regulations for mobile and stationary sources – continued.</li> </ul>
<ul style="list-style-type: none"> <li>• As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between AQM and small businesses.</li> </ul>
<ul style="list-style-type: none"> <li>• Paint stripping and miscellaneous coating at area sources (Subpart HHHHHH includes auto body shops).</li> <li>• Gasoline distribution at area sources (Subpart BBBB BB includes gasoline stations).</li> <li>• Electric arc furnace steelmaking facilities at area sources (Subpart YYYY Y) from scrap steel suppliers’ perspective.</li> </ul>
<ul style="list-style-type: none"> <li>• If warranted, prepare delegation packages and request delegation of authority for changes adopted for area source standards in Regulation 1138.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue working with the Delaware Automobile and Truck Recycler’s Association to provide pollution prevention perspectives and support for DNREC’s environmental program for salvage yards</li> </ul>
<ul style="list-style-type: none"> <li>• Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs for the residential and commercial sectors. Energy efficiency programs include:               <ul style="list-style-type: none"> <li>• Energy efficiency/conservation education, outreach, technical assistance.</li> <li>• Energy An\$wers Program                   <ul style="list-style-type: none"> <li>• Home Appliances</li> <li>• Business</li> </ul> </li> <li>• Energy Star Program</li> <li>• Sustainable Energy Utility - SEU</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement state facilities energy programs. State facilities energy programs include:               <ul style="list-style-type: none"> <li>• Utility Accounting</li> <li>• Energy Saving Performance Contracting</li> <li>• Electricity Procurement</li> <li>• Energy Star Program</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:               <ul style="list-style-type: none"> <li>• Green Energy Program                   <ul style="list-style-type: none"> <li>• Photovoltaic Electric</li> <li>• Photovoltaic Hot Water</li> <li>• Geothermal</li> <li>• Wind</li> </ul> </li> <li>• Technology Demonstration/Research &amp; Development Grant Program</li> <li>• Renewable Portfolio Goals</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement transportation programs. Transportation programs include:               <ul style="list-style-type: none"> <li>• Clean State Program – focusing on greater use of alternative transportation fuels</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to provide air toxics-related support to State through . . .               <ul style="list-style-type: none"> <li>• Reviewing of air permits.</li> <li>• Providing current regulatory interpretations.</li> <li>• Advising on likely future trends and actions.</li> <li>• Provide technical support, as needed, to . . .                   <ul style="list-style-type: none"> <li>• Area Source Compliance Group for revising Reg. 1102 Dry Cleaning incorporating the new residual risk requirements.</li> <li>• Engineering &amp; Compliance Branch in their implementation of the “Boiler MACT” case-by-case MACT determinations under Section 2.0 of Reg. 1138 (MACT Hammer).</li> <li>• Engineering &amp; Compliance Branch in their implementation of the “PVC” case-by-case MACT determinations under Section 2.0 of Reg. 1138 (MACT Hammer).</li> </ul> </li> </ul> </li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2008

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

- Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
- Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
- Continue to look for and track, if found, appropriate “air toxics indicators” to gauge progress in reducing air toxics.
- Complete 2005 HAPs emissions inventory to the extent there is information available by 6/08.
- By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.
- By September, complete a self-assessment of major mobile source air toxics reduction and education programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.
  - School and trucking industry anti-idling outreach programs.
  - Anti-idling compliance and enforcement program.

### Year 2008

#### **Air toxics resource development**

- Evaluate available training and encourage broader participation in risk-related training.
  - Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - Evaluate the need for air toxics-related training for staff and present, as needed.
  - Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
- Continue to assist in identifying resources and funding needed to implement communications and outreach programs.
- Develop and implement mechanisms to improve air toxics communications.
  - Continue searching for new mechanisms to improve air toxics communications between branches.
  - Continue to promote open communications between DNREC and small businesses on air toxics issues.

**2009**

## 2008 Air Toxics Strategic Plan

### Year 2009

<b>Implement an on-going program to address the risks from exposure to air toxic</b>
<ul style="list-style-type: none"> <li>• Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete year-end status report on the 2008 individual Strategic Plans.</li> </ul>
<ul style="list-style-type: none"> <li>• Track implementation and report year-end-status of the 2008 Air Toxics Strategic Plan.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete mid-year status report on the 2009 individual Strategic Plans.</li> </ul>
<ul style="list-style-type: none"> <li>• Track implementation and report mid-year status on the 2009 Air Toxics Strategic Plan.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate the updating of the ATSP for 2010-2014               <ul style="list-style-type: none"> <li>• Coordinate development of the 2010 ATSP including incorporation of DATAS results and community activity needs.</li> <li>• Update individual Strategic Plans for 2010-2014.</li> <li>• Update and finalize 2010 ATSP for years 2010 to 2014.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.               <ul style="list-style-type: none"> <li>• Continue to support and participate in the Claymont Industry Partnership Initiative.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.               <ul style="list-style-type: none"> <li>• Participate on the EPA Region 3's newly formed "Area Source Implementation Workgroup".</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify pollution prevention opportunities, develop strategies/solutions, and continue the DE pollution prevention program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.</li> </ul>

# 2008 Air Toxics Strategic Plan

## Year 2009

### **Build greater understanding of ambient air toxics environment**

- Determine ambient air toxics concentrations for selected HAPs in Delaware.
  - Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
  - Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
  - Continue to support University of Delaware's special project to provide near real time organic aerosol speciation at MLK monitoring site.
  - Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
  - Continue to operate the gas chromatographic mass spectrometer to quantify "Community Air Toxics" under EPA air toxics grant.
  - Issue final "Community Air Toxics" report by 12/31/09.
  - Identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab by 12/31/09.
  - Undertake new or special monitoring needs that may surface.
- Due to limited personnel resources, only one of the following programs will be initiated in 2009
  1. Initial modeling for DATAS-2005
    - Convert emission inventory data into model ready format.
    - Convert meteorological data into model ready format.
  2. Begin to integrate air toxics into future multi-pollutant (ozone/fine particulate/air toxics) modeling assessments to identify synergistic impacts of control strategies.

## Year 2009

### **Identify potential harm from exposure to air toxics**

- Continue to refine air toxics model for characterizing air toxics risks through utilization of applications in Sub-Grid Scale Variability (SGV).
- Characterize the cancer and non-cancer risks through future air toxics assessment programs.
  - Coordinate ongoing risk assessment support and guidance of DPH for air toxics risk reduction activities.
  - Participate in the implementation of DATAS-2009, if undertaken.
  - Develop risk assessment aspect for the implementation of DATAS-2009, if undertaken.

## Year 2009

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

- Finalize emissions inventory protocol for the implementation of DATAS-2009, if undertaken.
- Identify resources and funding needed to implement emissions inventory aspect of DATAS-2009.
- Provide emissions inventory support to the air toxics education and reduction programs, as required.
- Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.

## 2008 Air Toxics Strategic Plan

### Year 2009

<b>Identify options for reducing air toxics in the environment</b>
<ul style="list-style-type: none"> <li>• Continue implementation of a community-based air toxics reduction program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to monitor federal activities associated with the establishment of a new Lead NAAQS.</li> </ul>
<ul style="list-style-type: none"> <li>• Initiate assessment and prioritize regulatory needs in support of the community-based air toxics reduction program.</li> </ul>
<ul style="list-style-type: none"> <li>• Maintain open communications with Chamber of Shipping of America and the U.S.C.G. regarding any recent or impending changes in national or international shipping laws that might impact Section 46 of Regulation 1124.</li> </ul>
<ul style="list-style-type: none"> <li>• Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.               <ul style="list-style-type: none"> <li>• Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.</li> <li>• Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Develop a plan to promote smart growth oversight that encourages consideration of impact of mobile source emissions.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.               <ul style="list-style-type: none"> <li>• Newly proposed amendments to federal MACT and incinerator standards.                   <ul style="list-style-type: none"> <li>• Boiler and Process Heater MACT standard.</li> <li>• Newly proposed federal residual risk standards.                       <ul style="list-style-type: none"> <li>• Subpart N (Chrome plating facilities).</li> <li>• Subpart RRR (Secondary aluminum smelters).</li> <li>• Subpart VVV (Publicly Owned Treatment Works).</li> <li>• Subpart III (Flexible Polyurethane Foam).</li> </ul> </li> </ul> </li> <li>• Newly proposed federal area source standards under Section 112(k).                   <ul style="list-style-type: none"> <li>• The last 9 proposed standards (diverse categories) are due to be promulgated by June 2009.</li> <li>• As each area source standard is being proposed, evaluate the impacts of pollution prevention implementation in that sector.                       <ul style="list-style-type: none"> <li>• Paint stripping and miscellaneous coating at area sources (Subpart HHHHHH includes auto body shops).</li> <li>• Electric arc furnace steelmaking facilities at area sources (Subpart YYYYYY) from scrap steel suppliers' perspective.</li> </ul> </li> </ul> </li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Evaluate the need for the development of additional source category permits to address air toxics issues, ongoing.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement other air toxics-related communications and outreach programs.               <ul style="list-style-type: none"> <li>• Continue to participate in community/industrial air toxics outreaches and evaluate new opportunities.                   <ul style="list-style-type: none"> <li>• Claymont Coalition.</li> <li>• Claymont Industrial Partnership Initiative.</li> <li>• Explore new outreach opportunities.</li> </ul> </li> <li>• Continue to support Engineering and Compliance's community/industrial air toxics outreach programs.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify grant and funding opportunities.               <ul style="list-style-type: none"> <li>• Facilitate the identification, preparation and submission for transportation-related grants or other funding.</li> <li>• Continue to identify resources and funding needed to implement air toxics communications and outreach programs.</li> <li>• Work with and promote open communications with other branches, divisions and Departments on energy efficiency/conservation opportunities and pursue funding opportunities for projects.</li> </ul> </li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2009

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Promote the implementation of mobile source air toxics reduction initiatives/programs.                             <ul style="list-style-type: none"> <li>• Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the SmartWay Transport programs, as appropriate.</li> <li>• Complete development and commence implementation of the mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Insure continued or improved compliance of stationary sources.                             <ul style="list-style-type: none"> <li>• Continue to perform full compliance evaluations at all major and synthetic minor air toxics sources in accordance with the 6/29/07 compliance monitoring plan by 9/30/09.</li> <li>• Perform full compliance evaluations at all non-dry cleaning area air toxics sources during the 2008-9 time period.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Inspect 10% of the of the gasoline delivery vessel for vapor tightness at gasoline bulk terminals.</li> <li>• Incorporate updated MACT and Residual Risk requirements in air permits.                                     <ul style="list-style-type: none"> <li>• Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.</li> <li>• Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 30, as needed.</li> </ul> </li> <li>• As new area source standards are proposed and finalized by EPA, develop listings of affected sources, if appropriate.</li> <li>• Implement the compliance assistance program for sources that will be affected by future adoption of the area source paint stripping and coating standard (Subpart HHHHHH) into Reg. 1138.</li> <li>• Finalize and issue revised operating permits containing Subpart HHHHHH requirements, if warranted.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to conduct anti-idling outreach programs, as needed, for schools and the trucking industry and report status, as appropriate.</li> <li>• Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting anti-idling for school buses.</li> <li>• Continue to work with other State agencies including DPH on air toxics communications and outreaches.</li> </ul>
<ul style="list-style-type: none"> <li>• Provide support to Small Businesses on air toxics related issues.                             <ul style="list-style-type: none"> <li>• Continue to encourage new participation and to provide assistance to Delaware marinas in obtaining voluntary compliance certification under the Clean Marina program.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify and implement at least one new opportunity to increase the public awareness of actions that the public can take to reduce their risk exposure to air toxics, including appropriate P2 programs.</li> <li>• Implement education and outreach programs associated with the revised open burning requirements.</li> </ul>
<ul style="list-style-type: none"> <li>• Complete public outreach associated with the implementation of the enhanced low inspection and maintenance program in Sussex County.</li> <li>• Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory and P2 programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to coordinate implementation of area source protocol when area source standards are promulgated.                             <ul style="list-style-type: none"> <li>• Final set of area source standards are projected to be promulgated in 2009.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between AQM and small businesses.                             <ul style="list-style-type: none"> <li>• Paint stripping and miscellaneous coating at area sources (Subpart HHHHHH includes auto body shops).</li> <li>• Gasoline distribution at area sources (Subpart BBBB BB includes gasoline stations).</li> <li>• Electric arc furnace steelmaking facilities at area sources (Subpart YYYYYY) from scrap steel suppliers' perspective.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Provide support, if warranted, during the adoption of the area sources gasoline distribution standard (Subpart BBBB BB).</li> <li>• If warranted, prepare delegation packages and request delegation of authority for adoption of residual risk requirements and area source standards in Regulation 1138.</li> </ul>

Continued on next page

## 2008 Air Toxics Strategic Plan

### Year 2009

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

- Update and submit to EPA Region 3, if required, the area source plans for adoption, delegation, and/or implementation for existing and newly promulgated area source MACT rules.
- Adopt new and amend existing air toxics regulations for mobile and stationary sources.
  - Adopt a diesel chip reflash regulation, if the voluntary program is unsuccessful.
  - Adopt Delaware applicable area source standards under Section 112(k) into Regulation 38 prior to federal existing source compliance dates.
    - Adopt Subpart WWWW (Hospital Ethylene Oxide Sterilizers).
    - Adopt Subpart YYYYY (Electric Arc Furnaces).
    - Adopt SubpartsBBBBB and CCCCCC (Gasoline Distribution Infrastructure/Dispensing).
    - Adopt Subpart HHHHHH (Paint Stripping/Auto Body Coating).
  - Adopt applicable area source residual risk standards into Regulation 38 prior to federal existing source compliance dates.
    - Submit Start Action Notice for Subpart N (Chrome plating facilities), if warranted.
    - Amend Subpart T (Halogenated Solvent Degreasers).
- Commence review or adoption of regulations to reduce unacceptable risks identified in the community air toxics reduction programs.
  - As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.
- Implement a “Smoking Vehicle Reduction Program”.
  - Conduct baseline testing of smoking vehicles.
  - Develop and carryout “Smoking Vehicle” outreach program.
  - Establish and implement ongoing compliance and enforcement strategy.
- Complete annual I/M report and submit report to EPA R3, if appropriate.
- Facilitate the implementation of diesel retrofits.
- Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
- Continue to identify and implement energy efficiency programs for the residential and commercial sectors. Energy efficiency programs include:
  - Energy efficiency/conservation education, outreach, technical assistance.
  - Energy An\$wers Program
    - Business
    - Energy Star Program
  - Sustainable Energy Utility – SEU
    - Home Performance
- Continue to identify and implement state facilities energy programs. State facilities energy programs include:
  - Utility Accounting
  - Energy Saving Performance Contracting
  - Electricity Procurement
  - Energy Star Program
- Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:
  - Green Energy Program
    - Photovoltaic Electric
    - Photovoltaic Hot Water
    - Geothermal
    - Wind
  - Technology Demonstration/Research & Development Grant Program
  - Renewable Portfolio Goals

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## 2008 Air Toxics Strategic Plan

### Year 2009

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

- Continue to identify and implement transportation programs. Transportation programs include:
  - Clean State Program – focusing on greater use of alternative transportation fuels
- Continue to provide air toxics-related support to State through . . .
  - Reviewing of air permits.
  - Providing current regulatory interpretations.
  - Advising on likely future trends and actions.
  - Continue to provide technical support, as needed, to . . .
    - Engineering & Compliance Branch in their implementation of the “Boiler MACT” case-by-case MACT determinations under Section 2.0 of Reg. 1138 (MACT Hammer).

### Year 2009

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

- Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate. .
- Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
- Complete evaluation of conversions made under the voluntary diesel chip reflash program.
- Audit the enhanced low inspection and maintenance program in Sussex County.
- Continue to look for and track, if found, appropriate “air toxics indicators” to gauge progress in reducing air toxics.
- By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.
- By September, complete a self-assessment of major mobile source air toxics reduction and education programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.
  - “Smoking Vehicle Reduction Program” outreach programs.
  - “Smoking Vehicle Reduction Program” compliance and enforcement program.
  - School and trucking industry anti-idling outreach programs.
  - Anti-idling compliance and enforcement program.
  - Sussex I/M public outreach program.
  - Sussex I/M implementation program.
  - Voluntary diesel chip reflash conversion.
  - Mobile source air toxics reduction or education programs addressing hot spots.

### Year 2009

#### **Air toxics resource development**

- Evaluate available training and encourage broader participation in risk-related training.
  - Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - Evaluate the need for air toxics-related training for staff and present, as needed.
  - Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
- Develop and implement mechanisms to improve air toxics communications.
  - Continue to implement newly found mechanisms to improve air toxics communications between branches.
  - Continue to promote open communications between DNREC and small businesses on air toxics issues.

# 2010

## 2008 Air Toxics Strategic Plan

### Year 2010

<b>Implement an on-going program to address the risks from exposure to air toxic</b>
<ul style="list-style-type: none"><li>• Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.</li></ul>
<ul style="list-style-type: none"><li>• Review status and complete year-end status report on the 2009 individual Strategic Plans.</li></ul>
<ul style="list-style-type: none"><li>• Track implementation and report year-end-status of the 2009 Air Toxics Strategic Plan.</li></ul>
<ul style="list-style-type: none"><li>• Review status and complete mid-year status report on the 2010 individual Strategic Plans.</li></ul>
<ul style="list-style-type: none"><li>• Track implementation and report mid-year status on the 2010 Air Toxics Strategic Plan.</li></ul>
<ul style="list-style-type: none"><li>• Coordinate the updating of the ATSP for 2011-2015<ul style="list-style-type: none"><li>• Update individual Strategic Plans for 2011-2015.</li><li>• Update and finalize 2011 Air Toxics Strategic Plan for years 2011 to 2015.</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.</li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.</li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify pollution prevention opportunities, develop strategies/solutions, and continue the DE pollution prevention program.</li></ul>
<ul style="list-style-type: none"><li>• Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.</li></ul>
<ul style="list-style-type: none"><li>• Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.</li></ul>
<ul style="list-style-type: none"><li>• Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.</li></ul>
<ul style="list-style-type: none"><li>• Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.</li></ul>

## 2008 Air Toxics Strategic Plan

### Year 2010

<b>Build greater understanding of ambient air toxics environment</b>
<ul style="list-style-type: none"> <li>• Determine ambient air toxics concentrations for selected HAPs in Delaware.                             <ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate. .</li> <li>• Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> <li>• Continue to collaborate with University of Delaware on air toxics research and special projects.</li> </ul> </li> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.                             <ul style="list-style-type: none"> <li>• Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.</li> <li>• Continue to support the gas chromatographic mass spectrometer platform operations and maintenance.</li> <li>• Undertake new or special monitoring needs that may surface.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• If undertaken, develop modeling protocol for the implementation of DATAS-2009.</li> </ul>
<ul style="list-style-type: none"> <li>• Participate in the finalization and reporting on DATAS-2009, if undertaken.</li> </ul>
<ul style="list-style-type: none"> <li>• Provide air toxics modeled results (HAP concentrations) to support . . .                             <ul style="list-style-type: none"> <li>• Assessment of air toxics health impacts in communities.</li> <li>• Development of toxics standards based on cumulative risk.</li> <li>• Development of control strategies to meet the new air toxics standards.</li> <li>• Assist the air permitting decision-making process by considering cumulative impacts.</li> <li>• Improve the emissions inventory.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to integrate air toxics into future multi-pollutant (ozone/fine particulate/air toxics) modeling assessments to identify synergistic impacts of control strategies.</li> </ul>

### Year 2010

<b>Identify potential harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Continue to refine air toxics model for characterizing air toxics risks through utilization of applications in Sub-Grid Scale Variability (SGV).</li> </ul>
<ul style="list-style-type: none"> <li>• Characterize the cancer and non-cancer risks through future air toxics assessment programs.                             <ul style="list-style-type: none"> <li>• Coordinate ongoing risk assessment support and guidance of DPH for air toxics risk reduction activities.</li> <li>• Finalize risk assessment aspect for the implementation of DATAS-2009, if undertaken.</li> </ul> </li> </ul>

### Year 2010

<b>Gather information related to air toxics sources</b>
<ul style="list-style-type: none"> <li>• Submit 2008 NEI for HAPs, if required, by 6/1/10.</li> </ul>
<ul style="list-style-type: none"> <li>• Revise 2008 HAP emissions inventory for DATAS-2009.</li> </ul>
<ul style="list-style-type: none"> <li>• Provide emissions inventory support to the air toxics education and reduction programs, as required.</li> </ul>
<ul style="list-style-type: none"> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2010

<b>Identify options for reducing air toxics in the environment</b>
<ul style="list-style-type: none"> <li>• Continue the implementation of the air toxics reduction programs, as appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to monitor federal activities associated with the establishment of a new Lead NAAQS.</li> </ul>
<ul style="list-style-type: none"> <li>• Maintain open communications with Chamber of Shipping of America and the U.S.C.G. regarding any recent or impending changes in national or international shipping laws that might impact Section 46 of Regulation 1124.</li> </ul>
<ul style="list-style-type: none"> <li>• Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.               <ul style="list-style-type: none"> <li>• Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.</li> <li>• Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.               <ul style="list-style-type: none"> <li>• Newly proposed amendments to federal MACT and incinerator standards.</li> <li>• Newly proposed federal residual risk standards.</li> <li>• Newly proposed federal area source standards under Section 112(k), if EPA falls behind schedule.</li> <li>• As each area source standard is being proposed, evaluate the impacts of pollution prevention implementation in that sector.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Implement other air toxics-related communications and outreach programs.               <ul style="list-style-type: none"> <li>• Continue to participate in community/industrial air toxics outreaches and evaluate new opportunities.</li> <li>• Continue to support Engineering and Compliance's community/industrial air toxics outreach programs.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify grant and funding opportunities.               <ul style="list-style-type: none"> <li>• Facilitate the identification, preparation and submission for transportation-related grants or other funding.</li> <li>• Work with and promote open communications with other branches, divisions and Departments on energy efficiency/conservation opportunities and pursue funding opportunities for projects.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Evaluate the need for the development of additional Source Category Permits to address air toxics issues.</li> </ul>

### Year 2010

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Insure continued or improved compliance of stationary sources.               <ul style="list-style-type: none"> <li>• Continue to perform full compliance evaluations at all major and synthetic minor air toxics sources in accordance with the applicable compliance monitoring plan.</li> <li>• Perform full compliance evaluations at all non-dry cleaning area air toxics sources during the 2010-11 time period.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Inspect 10% of the of the gasoline delivery vessel for vapor tightness at gasoline bulk terminals.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Incorporate updated MACT and Residual Risk requirements in air permits.               <ul style="list-style-type: none"> <li>• Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.</li> <li>• Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 30, as needed.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• As new area source standards are proposed and finalized by EPA, develop listings of affected sources, if appropriate.</li> </ul>

Continued on next page

## 2008 Air Toxics Strategic Plan

### Year 2010

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Promote the implementation of mobile source air toxics reduction initiatives/programs.               <ul style="list-style-type: none"> <li>• Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the SmartWay Transport programs, as appropriate.</li> <li>• Continue implementation of the mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Implement other air toxics-related communications and outreach programs.               <ul style="list-style-type: none"> <li>• Continue to conduct anti-idling outreach programs for schools and the trucking industry and report status to EPA R3, as appropriate.</li> <li>• Implement education and outreach programs associated with the revised open burning requirements.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Provide support to Small Businesses on air toxics related issues.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory and P2 programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to coordinate implementation of area source protocol when area source standards are promulgated, if needed.</li> </ul>
<ul style="list-style-type: none"> <li>• Update and submit to EPA Region 3, if required, the area source plan for adoption, delegation, and/or implementation for existing and newly promulgated area source MACT rules.</li> </ul>
<ul style="list-style-type: none"> <li>• Adopt new and amend existing air toxics regulations for mobile and stationary sources.               <ul style="list-style-type: none"> <li>• Amend or submit negative declaration for Commercial and Industrial Solid Waster Incinerator Standard.</li> <li>• Amend Regulation 1138 by revising Subpart A (General Provisions) considering broadened applicability and changes since original adoption.</li> <li>• Adopt applicable area source residual risk standards into Regulation 1138, if needed.</li> <li>• Adopt Delaware applicable area source standards under Section 112(k) into Regulation 1138.</li> <li>• Continue review or adoption of regulations to reduce unacceptable risks identified in the community air toxics reduction programs.</li> <li>• As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.</li> <li>• As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between AQM and small businesses.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• If warranted, prepare delegation packages and request delegation of authority for changes adopted for area source standards in Regulation 38.</li> </ul>
<ul style="list-style-type: none"> <li>• Complete annual I/M report and submit report to EPA R3, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Facilitate the implementation of diesel retrofits.</li> </ul>
<ul style="list-style-type: none"> <li>• Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs for the residential and commercial sectors. Energy efficiency programs include:               <ul style="list-style-type: none"> <li>• Energy efficiency/conservation education, outreach, technical assistance.</li> <li>• Energy An\$wers Program</li> <li>• Energy Star Program</li> <li>• Sustainable Energy Utility - SEU</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement state facilities energy programs. State facilities energy programs include:               <ul style="list-style-type: none"> <li>• Utility Accounting</li> <li>• Energy Saving Performance Contracting</li> <li>• Electricity Procurement</li> <li>• Energy Star Program</li> </ul> </li> </ul>

Continued on next page

## 2008 Air Toxics Strategic Plan

### Year 2010

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:                             <ul style="list-style-type: none"> <li>• Green Energy Program                                     <ul style="list-style-type: none"> <li>• Photovoltaic Electric</li> <li>• Photovoltaic Hot Water</li> <li>• Geothermal</li> <li>• Wind</li> </ul> </li> <li>• Technology Demonstration/Research &amp; Development Grant Program</li> <li>• Renewable Portfolio Goals</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement transportation programs. Transportation programs include:                             <ul style="list-style-type: none"> <li>• Clean State Program – focusing on greater use of alternative transportation fuels</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to provide air toxics-related support to State through. . .                             <ul style="list-style-type: none"> <li>• Reviewing of air permits.</li> <li>• Providing current regulatory interpretations.</li> <li>• Advising on likely future trends and actions.</li> </ul> </li> </ul>

### Year 2010

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate. .</li> </ul>
<ul style="list-style-type: none"> <li>• Submit 2008 NEI for HAPs, if required, by 6/1/10.</li> </ul>
<ul style="list-style-type: none"> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> <li>• Revise 2008 HAP emissions inventory for DATAS-2009.</li> </ul>
<ul style="list-style-type: none"> <li>• Evaluate implementation of the “Smoking Vehicle Reduction Program”.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue tracking the “air toxics indicators”, if any are found.</li> </ul>
<ul style="list-style-type: none"> <li>• By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.</li> </ul>
<ul style="list-style-type: none"> <li>• By September, complete a self-assessment of major mobile source air toxics reduction and education programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.</li> </ul>

### Year 2010

<b>Air toxics resource development</b>
<ul style="list-style-type: none"> <li>• Evaluate available training and encourage broader participation in risk-related training.                             <ul style="list-style-type: none"> <li>• Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.</li> <li>• Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.</li> <li>• Evaluate the need for air toxics-related training for staff and present, as needed.</li> <li>• Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Develop and implement mechanisms to improve air toxics communications.                             <ul style="list-style-type: none"> <li>• Continue to implement newly found mechanisms to improve air toxics communications between branches.</li> <li>• Continue to promote open communications between DNREC and small businesses on air toxics issues.</li> </ul> </li> </ul>

# 2011

## 2008 Air Toxics Strategic Plan

### Year 2011

<b>Implement an on-going program to address the risks from exposure to air toxic</b>
<ul style="list-style-type: none"> <li>• Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.                             <ul style="list-style-type: none"> <li>• Review status and complete year-end status report on the 2010 individual Strategic Plans.</li> <li>• Track implementation and report year-end-status of the 2010 Air Toxics Strategic Plan.</li> <li>• Review status and complete mid-year status report on the 2011 individual Strategic Plans.</li> <li>• Track implementation and report mid-year status on the 2011 Air Toxics Strategic Plan.</li> <li>• Coordinate the updating of the ATSP for 2011-2015                                     <ul style="list-style-type: none"> <li>• Update individual Strategic Plans for 2012-2016.</li> <li>• Update and finalize 2012 Air Toxics Strategic Plan for years 2012 to 2016.</li> </ul> </li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify pollution prevention opportunities, develop strategies/solutions, and continue the DE pollution prevention program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.</li> </ul>

### Year 2011

<b>Build greater understanding of ambient air toxics environment</b>
<ul style="list-style-type: none"> <li>• Determine ambient air toxics concentrations for selected HAPs in Delaware.                             <ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.</li> <li>• Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> <li>• Continue to collaborate with University of Delaware on air toxics research and special projects.</li> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> <li>• Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.</li> <li>• Continue to support the gas chromatographic mass spectrometer platform operations and maintenance.</li> <li>• Undertake new or special monitoring needs that may surface.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Provide air toxics modeling support to meet community and internal needs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to integrate air toxics into future multi-pollutant (ozone/fine particulate/air toxics) modeling assessments to identify synergistic impacts of control strategies.</li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2011

<b>Identify potential harm from exposure to air toxics</b>
NA

### Year 2011

<b>Gather information related to air toxics sources</b>
<ul style="list-style-type: none"> <li>• Develop emissions inventory protocol for the implementation of the 2011 NEI, if needed.</li> <li>• Provide emissions inventory support to the air toxics education and reduction programs, as required.</li> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> </ul>

### Year 2011

<b>Identify options for reducing air toxics in the environment</b>
<ul style="list-style-type: none"> <li>• Continue the implementation of the air toxics reduction programs, as appropriate.</li> <li>• Continue to monitor federal activities associated with the establishment of a new Lead NAAQS.</li> <li>• Maintain open communications with Chamber of Shipping of America and the U.S.C.G. regarding any recent or impending changes in national or international shipping laws that might impact Section 46 of Regulation 1124.</li> <li>• Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.             <ul style="list-style-type: none"> <li>• Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.</li> <li>• Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.</li> </ul> </li> <li>• Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.</li> <li>• Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.             <ul style="list-style-type: none"> <li>• Newly proposed amendments to federal MACT and incinerator standards.</li> <li>• Newly proposed federal residual risk standards.</li> </ul> </li> <li>• Implement other air toxics-related communications and outreach programs.             <ul style="list-style-type: none"> <li>• Continue to participate in community/industrial air toxics outreaches and evaluate new opportunities.</li> <li>• Continue to support Engineering and Compliance's community/industrial air toxics outreach programs.</li> </ul> </li> <li>• Identify grant and funding opportunities.             <ul style="list-style-type: none"> <li>• Facilitate the identification, preparation and submission for transportation-related grants or other funding.</li> <li>• Work with and promote open communications with other branches, divisions and Departments on energy efficiency/conservation opportunities and pursue funding opportunities for projects.</li> </ul> </li> <li>• Evaluate the need for the development of additional Source Category Permits to address air toxics issues.</li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2011

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Promote the implementation of mobile source air toxics reduction initiatives/programs.               <ul style="list-style-type: none"> <li>• Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the SmartWay Transport programs, as appropriate.</li> <li>• Continue implementation of the mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Insure continued or improved compliance of stationary sources.               <ul style="list-style-type: none"> <li>• Continue to perform full compliance evaluations at all major and synthetic minor air toxics sources in accordance with the applicable compliance monitoring plan.</li> <li>• Perform full compliance evaluations at all non-dry cleaning area air toxics sources during the 2010-11 time period.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Inspect 10% of the of the gasoline delivery vessel for vapor tightness at gasoline bulk terminals.</li> <li>• Incorporate updated MACT and Residual Risk requirements in air permits.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Implement education and outreach programs associated with the revised open burning requirements.</li> <li>• Continue to conduct anti-idling outreach programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory and P2 programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Update and submit to EPA Region 3, if required, the area source plan for adoption, delegation, and/or implementation for existing and newly promulgated area source MACT rules.</li> </ul>
<ul style="list-style-type: none"> <li>• Adopt new and amend existing air toxics regulations for mobile and stationary sources.               <ul style="list-style-type: none"> <li>• Amend Subpart RRR (Secondary aluminum smelters) for federal residual risk requirements, if warranted.</li> <li>• Amend Subpart N (Chrome plating facilities) for federal residual risk requirements.</li> <li>• Adopt Delaware applicable area source standards under Section 112(k) into Regulation 1138, if needed.</li> <li>• Continue review or adoption of regulations to reduce unacceptable risks identified in the community air toxics reduction program.</li> <li>• As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.</li> <li>• Provide support to Small Businesses on air toxics related issues.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• If warranted, prepare delegation packages and request delegation of authority for changes adopted in the Subpart A (General Provisions) and for adoption of area source standards in Regulation 1138.</li> </ul>
<ul style="list-style-type: none"> <li>• Complete annual I/M report and submit report to EPA R3, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Facilitate the implementation of diesel retrofits.</li> </ul>
<ul style="list-style-type: none"> <li>• Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs for the residential and commercial sectors. Energy efficiency programs include:               <ul style="list-style-type: none"> <li>• Energy efficiency/conservation education, outreach, technical assistance.</li> <li>• Energy Answers Program</li> <li>• Energy Star Program</li> <li>• Sustainable Energy Utility - SEU</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement state facilities energy programs. State facilities energy programs include:               <ul style="list-style-type: none"> <li>• Utility Accounting</li> <li>• Energy Saving Performance Contracting</li> <li>• Electricity Procurement</li> <li>• Energy Star Program</li> </ul> </li> </ul>

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## 2008 Air Toxics Strategic Plan

### Year 2011

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:               <ul style="list-style-type: none"> <li>• Green Energy Program                   <ul style="list-style-type: none"> <li>• Photovoltaic Electric</li> <li>• Photovoltaic Hot Water</li> <li>• Geothermal</li> <li>• Wind</li> </ul> </li> <li>• Technology Demonstration/Research &amp; Development Grant Program</li> <li>• Renewable Portfolio Goals</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement transportation programs. Transportation programs include:               <ul style="list-style-type: none"> <li>• Clean State Program – focusing on greater use of alternative transportation fuels</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to provide air toxics-related support to State through...               <ul style="list-style-type: none"> <li>• Reviewing of air permits.</li> <li>• Providing current regulatory interpretations.</li> <li>• Advising on likely future trends and actions.</li> </ul> </li> </ul>

### Year 2011

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate. .</li> </ul>
<ul style="list-style-type: none"> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> <li>• Continue tracking the “air toxics indicators”, if any are found.</li> </ul>
<ul style="list-style-type: none"> <li>• By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.</li> </ul>
<ul style="list-style-type: none"> <li>• By September, complete a self-assessment of major mobile source air toxics reduction and education programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.</li> </ul>

### Year 2011

<b>Air toxics resource development</b>
<ul style="list-style-type: none"> <li>• Evaluate available training and encourage broader participation in risk-related training.               <ul style="list-style-type: none"> <li>• Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.</li> <li>• Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.</li> <li>• Evaluate the need for air toxics-related training for staff and present, as needed.</li> <li>• Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Develop and implement mechanisms to improve air toxics communications.               <ul style="list-style-type: none"> <li>• Continue to implement newly found mechanisms to improve air toxics communications between branches.</li> <li>• Continue to promote open communications between DNREC and small businesses on air toxics issues.</li> </ul> </li> </ul>

# 2012

## 2008 Air Toxics Strategic Plan

### Year 2012

<b>Implement an on-going program to address the risks from exposure to air toxic</b>
<ul style="list-style-type: none"> <li>• Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete year-end status report on the 2010 individual Strategic Plans.</li> </ul>
<ul style="list-style-type: none"> <li>• Track implementation and report year-end-status of the 2011 Air Toxics Strategic Plan.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete mid-year status report on the 2012 individual Strategic Plans.</li> </ul>
<ul style="list-style-type: none"> <li>• Track implementation and report mid-year status on the 2012 Air Toxics Strategic Plan.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate the updating of the ATSP for 2013-2017                             <ul style="list-style-type: none"> <li>• Update individual Strategic Plans for 2013-2017.</li> <li>• Update and finalize 2013 Air Toxics Strategic Plan for years 2013 to 2017.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify pollution prevention opportunities, develop strategies/solutions, and continue the DE pollution prevention program.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.</li> </ul>

### Year 2012

<b>Build greater understanding of ambient air toxics environment</b>
<ul style="list-style-type: none"> <li>• Determine ambient air toxics concentrations for selected HAPs in Delaware.                             <ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.</li> <li>• Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> <li>• Continue to collaborate with University of Delaware on air toxics research and special projects.</li> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> <li>• Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.</li> <li>• Continue to support the gas chromatographic mass spectrometer platform operations and maintenance.</li> <li>• Undertake new or special monitoring needs that may surface.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Provide air toxics modeling support to meet community and internal needs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to integrate air toxics into future multi-pollutant (ozone/fine particulate/air toxics) modeling assessments to identify synergistic impacts of control strategies.</li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2012

<b>Identify potential harm from exposure to air toxics</b>
NA

### Year 2012

<b>Gather information related to air toxics sources</b>
<ul style="list-style-type: none"> <li>• Develop the 2011 NEI for HAPs. Expected completion 6/1/13.</li> </ul>
<ul style="list-style-type: none"> <li>• Provide emissions inventory support to the air toxics education and reduction programs, as required.</li> </ul>
<ul style="list-style-type: none"> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> </ul>

### Year 2012

<b>Identify options for reducing air toxics in the environment</b>
<ul style="list-style-type: none"> <li>• Continue the implementation of the air toxics reduction programs, as appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to monitor federal activities associated with the establishment of a new Lead NAAQS.</li> </ul>
<ul style="list-style-type: none"> <li>• Maintain open communications with Chamber of Shipping of America and the U.S.C.G. regarding any recent or impending changes in national or international shipping laws that might impact Section 46 of Regulation 1124.</li> </ul>
<ul style="list-style-type: none"> <li>• Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.             <ul style="list-style-type: none"> <li>• Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.</li> <li>• Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.             <ul style="list-style-type: none"> <li>• Newly proposed amendments to federal MACT and incinerator standards.</li> <li>• Newly proposed federal residual risk standards.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Implement other air toxics-related communications and outreach programs.             <ul style="list-style-type: none"> <li>• Continue to participate in community/industrial air toxics outreaches and evaluate new opportunities.</li> <li>• Continue to support Engineering and Compliance's community/industrial air toxics outreach programs.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify grant and funding opportunities.             <ul style="list-style-type: none"> <li>• Facilitate the identification, preparation and submission for transportation-related grants or other funding.</li> <li>• Work with and promote open communications with other branches, divisions and Departments on energy efficiency/conservation opportunities and pursue funding opportunities for projects.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Evaluate the need for the development of additional Source Category Permits to address air toxics issues.</li> </ul>

## 2008 Air Toxics Strategic Plan

### Year 2012

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Promote the implementation of mobile source air toxics reduction initiatives/programs.               <ul style="list-style-type: none"> <li>• Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the SmartWay Transport programs, as appropriate.</li> <li>• Continue implementation of the mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Insure continued or improved compliance of stationary sources.               <ul style="list-style-type: none"> <li>• Continue to perform full compliance evaluations at all major and synthetic minor air toxics sources in accordance with the applicable compliance monitoring plan.</li> <li>• Perform full compliance evaluations at all non-dry cleaning area air toxics sources during the 2011-12 time period.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Inspect 10% of the of the gasoline delivery vessel for vapor tightness at gasoline bulk terminals.</li> <li>• Incorporate updated MACT and Residual Risk requirements in air permits.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Implement education and outreach programs associated with the revised open burning requirements.</li> <li>• Continue to conduct anti-idling outreach programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory and P2 programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Update and submit to EPA Region 3, if required, the area source plan for adoption, delegation, and/or implementation for existing and newly promulgated area source MACT rules.</li> </ul>
<ul style="list-style-type: none"> <li>• Adopt new and amend existing air toxics regulations for mobile and stationary sources.               <ul style="list-style-type: none"> <li>• Adopt Delaware applicable area source standards under Section 112(k) into Regulation 1138, if needed.</li> <li>• Adopt Delaware applicable area source residual risk standards into Regulation 1138, if needed.</li> <li>• Continue review or adoption of regulations to reduce unacceptable risks identified in the community air toxics reduction program.</li> <li>• As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.</li> <li>• Provide support to Small Businesses on air toxics related issues.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• If warranted, prepare delegation packages and request delegation of authority for changes adopted for area source standards in Regulation 38.</li> </ul>
<ul style="list-style-type: none"> <li>• Complete annual I/M report and submit report to EPA R3, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Facilitate the implementation of diesel retrofits.</li> </ul>
<ul style="list-style-type: none"> <li>• Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs for the residential and commercial sectors. Energy efficiency programs include:               <ul style="list-style-type: none"> <li>• Energy efficiency/conservation education, outreach, technical assistance.</li> <li>• Energy An\$wers Program</li> <li>• Energy Star Program</li> <li>• Sustainable Energy Utility - SEU</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement state facilities energy programs. State facilities energy programs include:               <ul style="list-style-type: none"> <li>• Utility Accounting</li> <li>• Energy Saving Performance Contracting</li> <li>• Electricity Procurement</li> <li>• Energy Star Program</li> </ul> </li> </ul>

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## 2008 Air Toxics Strategic Plan

### Year 2012

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<ul style="list-style-type: none"> <li>• Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:                             <ul style="list-style-type: none"> <li>• Green Energy Program                                     <ul style="list-style-type: none"> <li>• Photovoltaic Electric</li> <li>• Photovoltaic Hot Water</li> <li>• Geothermal</li> <li>• Wind</li> </ul> </li> <li>• Technology Demonstration/Research &amp; Development Grant Program</li> <li>• Renewable Portfolio Goals</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement transportation programs. Transportation programs include:                             <ul style="list-style-type: none"> <li>• Clean State Program – focusing on greater use of alternative transportation fuels</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to provide air toxics-related support to State through. . .                             <ul style="list-style-type: none"> <li>• Reviewing of air permits.</li> <li>• Providing current regulatory interpretations.</li> <li>• Advising on likely future trends and actions.</li> </ul> </li> </ul>

### Year 2012

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate. .</li> </ul>
<ul style="list-style-type: none"> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue tracking the “air toxics indicators”, if any found.</li> </ul>
<ul style="list-style-type: none"> <li>• By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.</li> </ul>
<ul style="list-style-type: none"> <li>• By September, complete a self-assessment of major mobile source air toxics reduction and education programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.</li> </ul>

### Year 2012

<b>Air toxics resource development</b>
<ul style="list-style-type: none"> <li>• Evaluate available training and encourage broader participation in risk-related training.                             <ul style="list-style-type: none"> <li>• Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.</li> <li>• Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.</li> <li>• Evaluate the need for air toxics-related training for staff and present, as needed.</li> <li>• Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Develop and implement mechanisms to improve air toxics communications.                             <ul style="list-style-type: none"> <li>• Continue to implement newly found mechanisms to improve air toxics communications between branches.</li> <li>• Continue to promote open communications between DNREC and small businesses on air toxics issues.</li> </ul> </li> </ul>