

**Delaware  
Air Quality  
Management**

**2007**

**Air Toxics Strategic Plan**

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**Air Quality Management**  
**2007 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 2007 ATSP, finalized on February 27, 2007, 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**

**2007**

## 2007 Air Toxics Strategic Plan

### Year 2007

<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>• Track implementation and report year-end-status of the 2006 Air Toxics Strategic Plan (ATSP) by 2/28/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Finalize the 2007 ATSP and submit to EPA R3 by 2/28/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete year-end status report on the 2006 individual Strategic Plans by 1/19/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete mid-year status report on the 2007 individual Strategic Plans by 7/31/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Track implementation and report mid-year status on the 2007 ATSP by 9/28/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate the updating of the ATSP for 2008-2012</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate development of the 200 Air Toxics Strategic Plan (ATSP) for the years 2007 to 2011.</li> </ul>
<ul style="list-style-type: none"> <li>• Incorporate risk results from the DATAS Phase I and II into the preparation and development of the air toxics strategic planning process.</li> </ul>
<ul style="list-style-type: none"> <li>• Update individual Strategic Plans for 2008-2012 by 10/31/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Update and finalize 2008 ATSP for years 2008 to 2012 by 12/31/07 and submit to EPA R3, if appropriate.</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 implementing 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 and organization structure to better address risk-based air toxics programs, as needed.</li> </ul>
<ul style="list-style-type: none"> <li>• Establish an internal protocol and identify lead to implement Branch's air toxics strategic planning activities by 3/30/07.</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>
<ul style="list-style-type: none"> <li>• <b>Establish and staff a separate mobile source program. (ON HOLD)</b></li> </ul>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

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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.</li> </ul>
<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 on 3/30, 6/30, 9/30 and 12/31.</li> </ul>
<ul style="list-style-type: none"> <li>• Submit quarterly air toxics monitoring data to national AIRS-AQS database following validation of laboratory results.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to enhance knowledge of ambient air toxics concentration for selected aerosols and mobile emissions through cooperative special projects with University of Delaware and Duke.</li> </ul>
<ul style="list-style-type: none"> <li>• Present results of completed E-DATAS project to Branch employees.</li> </ul>
<ul style="list-style-type: none"> <li>• Undertake a special project with UD to provide near real time organic aerosol speciation at MLK, start-up date yet to be determined.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Continue to identify funding requirements and sources, as well as, staffing needed in order to. . .</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Fully implement our enhanced time-resolution capabilities for VOC measurements</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Potential projects would provide</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Time-integrated air toxics data for air monitoring group.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improve model validation.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as potential information source for SIP development.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Means to investigate predicted air toxics hot-spots throughout state.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as an analytical tool for addressing additional air toxics projects.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Undertake new or special monitoring needs that may surface.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Provide air toxics modeled results (HAP concentrations) based on DATAS-2003 emissions inventory, to support . . .</li> </ul>
<ul style="list-style-type: none"> <li>• Assessment of air toxics health impacts in communities by 1/31/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Assessment of air toxics health impacts in communities on as needed basis.</li> </ul>
<ul style="list-style-type: none"> <li>• Development of toxics standards based on cumulative risk on as needed basis.</li> </ul>
<ul style="list-style-type: none"> <li>• Development of control strategies to meet the new air toxics standards on as needed basis.</li> </ul>
<ul style="list-style-type: none"> <li>• Assist the air permitting decision-making process by considering cumulative impacts on as needed basis.</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 on control strategies.</li> </ul>
<ul style="list-style-type: none"> <li>• Determine need for or value of conducting another DATAS project in 2009 by 12/31/07.</li> </ul>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

## 2007 Air Toxics Strategic Plan

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

- Characterize the cancer and non-cancer risks associated with 2003 modeled results.
  - Provide modeled concentrations to DPH for risk assessments.
    - From 2003 local-scale and 1999 regional-scale modeling by 1/31/07.
    - From 2002 (other states) and 2003 (Delaware) regional-scale modeling by 3/31/07.
  - Reconcile the DATAS-2003 monitored and modeled concentrations for the five (5) air toxics monitoring sites by 4/30/07.
    - Compounds modeled by local-scale modeling by 1/31/07.
    - Compounds modeled by regional-scale modeling by 4/30/07.
  - Coordinate risk assessments needs and results for model-generated for DATAS Phase II with DPH by 2/28/07.
  - Complete DATAS-2003 Phase II modeling report by 4/30/07
  - Analyze monitoring data from completed special monitoring projects, i.e. AQM/UD, and refine air toxics model, if appropriate.
    - Commence assessment of model performance based on E-DATAS mobile van measurements by 6/29/07.
    - Commence source apportionment analyses for air toxics including residential wood stoves and diesel PM by 6/29/07.
  - Review availability and the cost for DATAS-compatible software that will better illustrate the levels of risk and recommend path forward by 6/30/07.
  - **Acquire needed software and hardware to better illustrate the levels of risk by 7/31/07.**
  - Coordinate ongoing risk assessment support and guidance of DPH for air toxics control strategy implementation and risk management planning activities.
    - Identify and assess alternatives to DPH-provided risk assessments by 12/31/07, if appropriate.
  - 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.
  - Coordinate E&C responses to DATAS results with other AQM branches to ensure consistent responses.
  - Review DATAS Phase II findings and assess potential impact of dry cleaning and gasoline distribution air toxics on the public's health.

### Year 2007

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

- Develop a listing of sources that will be affected by proposed "urban" area source standards, under Sect. 112(k).
- Develop and implement protocols to respond to future proposed residual risk standards and urban area source rulemaking by 3/30/07. Protocols to include at minimum, . . .
  - Identifying presence and number of affected sources in Delaware.
  - Establishing organizational oversight.
  - Source identification.
  - Preparing comments on EPA proposed rule.
  - Path forward.
- Commence working on source apportionment with Mohammed Majeed associated with the DATAS Phase II results in 3Q07.
- Investigate emission inventory inputs and/or assumptions for air toxics of concern as indicated by DATAS Phase II modeling and risk assessment results.
- Provide emissions inventory support to the air toxics education and reduction programs, as required.
- Develop and submit 2005 NEI for HAPs from stationary point sources to EPA R3 by 6/1/07.
- Determine need for or value of modeling risk based on 2005 HAPs emission inventory by 12/31/07.

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## 2007 Air Toxics Strategic Plan

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<b>Identify options for reducing air toxics in the environment</b>
<ul style="list-style-type: none"> <li>• Determine authorities delegated for residual risk standards applicable to major sources under the April 4, 1996 Title V Memorandum of Understanding and develop path forward, if needed, by 3/31/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Explore delegation alternatives with EPA Region 3 for area source rules promulgated under 112(k) by 9/28/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Work with E&amp;C and ASC to develop protocol to address area source standard under 112(k) by 1/15/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to support and participate in the Claymont Industry Partnership Initiative.</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>• <b>Continue to implement, with inputs from the Cancer Consortium, the Wilmington community-based air toxics reduction program.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Identify and engage a professional facilitator to conduct the community meetings.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify and secure stakeholders interested in participating in the Wilmington community-based air toxics reduction program.</li> </ul>
<ul style="list-style-type: none"> <li>• Working with the stakeholders, identify acceptable meeting dates, times and locations.</li> </ul>
<ul style="list-style-type: none"> <li>• Kick-off community-based air toxics reduction program consistent with the stakeholders' schedule.</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 12/31/07.</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>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• Newly proposed federal residual risk standards, applicable to Delaware. The following are scheduled for proposal in June 2007.</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart N (Chrome plating facilities).</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart U (Polymers &amp; Resins – Group 1).</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart Y (Marine vessel loading facilities).</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart CC (Petroleum refining facilities).</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart GG (Aerospace coating facilities).</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart RRR (Secondary aluminum smelters).</li> </ul>
<ul style="list-style-type: none"> <li>• Subpart VVV (Publicly Owned Treatment Works).</li> </ul>
<ul style="list-style-type: none"> <li>• Generic residual risk rule or alternative residual risk methodologies, when proposed by EPA.</li> </ul>
<ul style="list-style-type: none"> <li>• Newly proposed urban area source standards proposed under Section 112(k), if applicable to Delaware.</li> </ul>
<ul style="list-style-type: none"> <li>• Performance Based Standard for "urban" area source Federal rulemaking.</li> </ul>
<ul style="list-style-type: none"> <li>• Hospital sterilizers in 1Q2007.</li> </ul>
<ul style="list-style-type: none"> <li>• Gasoline distribution – Stage 1 (includes gasoline service stations) in 1Q2007.</li> </ul>
<ul style="list-style-type: none"> <li>• 20 others yet to be identified.</li> </ul>
<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.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to evaluate and, as appropriate, act upon federal rulemakings.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Review and comment, if appropriate, on federally proposed mobile source air toxics rules. (ON HOLD)</b></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.</li> </ul>
<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 on 3/15/07 &amp; 9/30/07.</li> </ul>
<ul style="list-style-type: none"> <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 on 3/15/07 &amp; 9/30/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Schedule presentation of the mobile source air toxics results following the release of the DATAS Phase II report.</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 12/31/07.</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 on 3/15, 6/30, 9/30 and 12/31.</li> </ul>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

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## 2007 Air Toxics Strategic Plan

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

- Judge ability to take a leadership role in the financial grant process.
  - Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - Investigate opportunities for other educational grants to create/disseminate information about risk and air toxics, ongoing.
    - Explore and implement educational grant opportunity, if found.
    - Continue to identify resources and funding needed to implement DATAS and other air toxics communications and outreach programs.
    - Working with other branches, identify and pursue funding opportunities for implementing community-based projects.
- Identify and evaluate options for adopting and implementing the urban area source standards.
- Explore options for implementing the residual risk requirements for Dry Cleaning facilities by 3/31/07.
- Evaluate the need for the development of additional source category permits to address air toxics issues, ongoing.

### Year 2007

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

- Promote the implementation of mobile source air toxics reduction initiatives/programs.
  - Working with other State and Regional agencies, actively promote implementation of the Best Workplaces for Commuters and SmartWay Transport programs.
  - Report on activities conducted in support of the Best Workplaces for Commuters and SmartWay Transport programs. Report status to EPA R3 on 3/15/07 & 9/30/07.
- **Actively promote electrification projects.**
  - **Truck Stops. (ON HOLD)**
  - **Warehouses. (ON HOLD)**
  - **Ports. (ON HOLD)**
- Insure continued or improved compliance of stationary sources.
  - Conducting timely compliance inspections.
    - Perform full compliance evaluations at all major and synthetic minor air toxics sources in accordance with the compliance monitoring plan submitted 9/2/2005 by 9/30/07.
    - Inspect 25% of the dry cleaning facilities by 9/29/07.
    - Inspect 25% of the auto body refinishing shops.
    - Develop an inspection strategy for meeting the residual risk requirements for gasoline delivery vessels.
    - Perform full compliance evaluations at all non-dry cleaning area air toxics sources in accordance with the compliance monitoring plan submitted 9/2/2005 by 9/30/07.
  - Revise dry cleaner source category permit consistent with the residual risk requirements being newly adopted into Subpart M of Regulation 38.
  - Develop a dry cleaning compliance assistance program for meeting the residual risk requirements by 3/31/07.
  - Commence dry cleaning on-site compliance assistance program for the residual risk requirements by 6/30/07.
  - Provide outreach and education support for Area Sources' dry cleaning compliance assistance program.
  - Continue working with AQM to educate Drycleaners about new residual risk standard and changes to the source category permit.
  - Provide technical support, as needed, to ASC for amending the Dry Cleaning Source Category Permits to incorporate the residual risk requirements.
  - Incorporating updated MACT requirements in air permits.
    - Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
    - Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 30, as needed.
  - Provide technical support, as needed, to E&C for Invista's submission of the Boiler MACT low risk determination.

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

- Implement communications and outreach aspect of DATAS Phase II.
  - **Finalize communications and outreach aspect of the DATAS Phase II program and complete final DATAS report.**
  - Continue DATAS public outreach agreement with next project phase.
- Implement other air toxics-related communications and outreach programs.
  - Implement an anti-idling outreach programs for schools and school districts and report status to EPA R3 on 3/15, 6/30, 9/30 and 12/31.
    - Finalize school workbooks by 8/31/07.
    - Complete development of outreach by 9/31/07.
    - Conduct initial school outreach by 10/31/07.
    - Commence outreach programs by 12/31/07.
  - Participate in community/industrial air toxics outreaches and evaluate new opportunities.
    - Claymont Coalition.
    - Claymont Industrial Partnership Initiative.
    - Explore new outreach opportunities.
  - Continue to support Engineering and Compliance’s community/industrial air toxics outreach programs.
  - Continue to conduct anti-idling outreach programs, as needed, for the trucking industry and report status to EPA R3 on 3/15, 6/30, 9/30 and 12/31.
  - Develop and implement education and outreach programs associated with the open burning rulemaking and its implementation.
  - Continue to work with other State agencies including DPH on air toxics communications and outreaches.
- Adopt new and amend existing air toxics regulations for mobile and stationary sources.
  - Adopting new air toxics rules.
    - Adopt new Smoking Vehicle regulation by 12/31/07.
  - Amending existing air toxics rules.
    - Amend Regulation 31 to expand the low enhanced inspection and maintenance program to include Sussex County by 9/31/07.
    - Amend, if appropriate, Delaware Regulation 1145 based on anti-idling model rule for on-road diesel engines by 12/31/07.
    - Amend Regulation 24 by adopting new Section 46 to reduce the emissions of VOCs and HAPs from lightering operations by 2/11/07.
    - Amend Regulation 13 to expand the prohibition on open burning statewide by 6/29/07.
    - Amend Regulation 25 by amending new source review requirements by 3/30/07.
    - Amend Regulation 38 Subpart M (Dry Cleaners) for residual risk standard and title V permitting changes by 12/31/07.
    - Amend Regulation 38 Subpart N (Chrome Plating) for MACT standard and title V permitting changes by 10/31/07.
    - Amend Regulation 38 Subpart T (Solvent Degreasers) for title V permitting changes by 10/31/07.
    - Amend Regulation 38 Subpart RRR (Aluminum Sweat Furnaces) for title V permitting changes by 10/31/07.
    - Amend Regulation 41 by amending Section 2 (Consumer Products) by 12/31/07.
    - Amend Regulation 41 by amending Section 3 (Portable Fuel Containers) by 12/31/07.
    - Amend Regulation 41 by adding a new Section (Adhesives and Sealants) by 12/31/07.
  - Submit Start Action Notice to amend Regulation 38 Subpart A (General Provisions) to broaden applicability to all MACT standards and to update considering changes since original adoption by 12/30/07.
  - As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.
  - As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between AQM and small businesses.

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

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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>• Coordinate implementation of area source protocol when area source standards are promulgated.               <ul style="list-style-type: none"> <li>• Four area source standards by 1/31/07.</li> <li>• Ten area source standards by 7/31/07.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Update and submit to EPA Region 3 the area source plan for adoption, delegation, and/or implementation for existing and newly promulgated area source MACT rules by 2/28/07 and 9/30/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Develop and implement protocols for enforcement of newly promulgated federal and AQM regulations by 6/30/07. Protocols to include at minimum, . . .               <ul style="list-style-type: none"> <li>• Establishing organizational oversight.</li> <li>• Source identification.</li> <li>• Permitting activities and timelines associated with rule’s compliance requirements.</li> <li>• Resource and training needs.</li> <li>• Path forward.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Pending outcome of delegation alternatives review, prepare delegation packages and request delegation of authority for changes adopted in Regulation 38 for area source standards.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to participate on regional and national rulemaking committees, as appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify and implement one (1) joint educational opportunities with other DNREC agencies and/or other State or local agencies to increase the public awareness of actions that will reduce their risk from exposure to air toxics. Potential new areas include:               <ul style="list-style-type: none"> <li>• DATAS Phase II Report Release.</li> <li>• Pollution prevention (P2) around the home.</li> <li>• Air toxics around the home.</li> <li>• Gasoline distribution rule.</li> <li>• Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.</li> <li>• Anti-idling Regulation education and outreach.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify and pursue potential joint opportunities with industry and other agencies as a possible option to regulatory requirements that will reduce the risk from exposure to air toxics. Potential new areas include:               <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> <li>• Mercury switch P2 program.</li> <li>• An “urban” area source rule.</li> <li>• Claymont Industry Partnership Initiative.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Identify and pursue potential joint opportunities with the industry and other agencies. Potential new areas include:               <ul style="list-style-type: none"> <li>• Energy Saving Performance Contracting.</li> <li>• Energy An\$wers Program.</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. Potential new areas include:               <ul style="list-style-type: none"> <li>• Implementation of DE-PA-MARAMA auxiliary power unit (APU) grant project.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Assist Brandywine school district with installation of diesel retrofits.</li> </ul>
<ul style="list-style-type: none"> <li>• Facilitate the implementation of school bus diesel retrofits associated with the 2006 enforcement settlement funding.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate the anti-idling enforcement effort.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement a “Smoking Vehicle Reduction Program”.               <ul style="list-style-type: none"> <li>• Implement diesel emissions opacity instrumentation training program by 12/31/07.</li> <li>• Develop and produce outreach materials and program to support baseline testing of smoking vehicle by 12/31/07.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Complete annual I/M report and submit report to EPA R3 by 7/31/07.</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.</li> <li>• Renewable portfolio goals.</li> </ul> </li> </ul>

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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>• Continue to identify and implement energy efficiency programs. Energy efficiency programs include:               <ul style="list-style-type: none"> <li>• Energy efficiency and conservation education.</li> <li>• Building energy codes.</li> <li>• Building energy efficiency.</li> <li>• Energy Star program.</li> <li>• Technical assistance and outreach for residential, commercial, industrial and agricultural customers.</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> <li>• Installation of bio-diesel station in Bear.</li> <li>• Potential ethanol plant.</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>• Track State energy consumption and costs.</li> <li>• Performance contracting.</li> <li>• Electricity procurement for state-owned facilities.</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 2007

<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 on 3/30, 6/30, 9/30 and 12/31.</li> </ul>
<ul style="list-style-type: none"> <li>• Work in cooperation with other AQM Branches; track the emissions of air toxics of concern from significant sources contributing to elevated risks from exposure to air toxics.</li> </ul>
<ul style="list-style-type: none"> <li>• Working with other branches and EPA R3, continue to look for appropriate “air toxics indicators” to gauge progress in reducing air toxics.</li> </ul>
<ul style="list-style-type: none"> <li>• Develop and submit 2005 NEI for HAPs from stationary point sources to EPA R3 by 6/1/07.</li> </ul>

## 2007 Air Toxics Strategic Plan

### Year 2007

#### **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.
  - Encourage broadened participation of air toxics risk training.
  - Encourage broadened participation on energy efficiency, conservation and education training.
  - Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - Continue to encourage broad participation in Regional air toxics training and workshops, when offered.
  - **Evaluate the need for air toxics related (risk, pollution prevention, etc.) 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 DATAS and other air toxics communications and outreaches.
- Identify better mechanisms to improve air toxics communications between branches.
- Continue search for “painless” and better way to keeping Air Quality Management current on the ongoing status of the Air Toxics Strategic Plan.
- Promote open communications between programs on air toxics issues.
  - Jointly explore needs and opportunities for pollution prevention training with AQM’s Engineering and Compliance Branch by 9/29/07.
  - Continue to promote open communications between DNREC and small businesses on air toxics issues.
  - Promote open communications between branches, divisions and departments on energy efficiency, conservation and education.
- Assess potential synergy between the Delaware Energy Office’s and AQM’s mobile source programs and recommend path forward, if synergy is found, by 6/29/07.

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

**2008**

## 2007 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.</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.</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 Phase I and II into the preparation and development of the air toxics strategic planning process.</li><li>• Incorporate developments from air toxics reduction program activities 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.</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 implement 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>

## 2007 Air Toxics Strategic Plan

### Year 2008

<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.</li> </ul>
<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 quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to support University of Delaware's special project to provide near real time organic aerosol speciation at MLK monitoring site.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Continue to identify funding requirements and sources, as well as, staffing needed in order to . . .</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Fully implement our enhanced time-resolution capabilities for VOC measurements</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Potential projects would provide</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Time-integrated air toxics data for air monitoring group.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improve model validation.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as potential information source for SIP development.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Means to investigate predicted air toxics hot-spots throughout state.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as an analytical tool for addressing additional air toxics projects.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Undertake new or special monitoring needs that may surface.</b></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 on control strategies.</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 through future air toxics assessment programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate ongoing risk assessment support and guidance of DPH for air toxics control strategy implementation and risk management planning activities.</li> </ul>
<ul style="list-style-type: none"> <li>• Participate in the development and implementation of DATAS-2009, if undertaken.</li> </ul>
<ul style="list-style-type: none"> <li>• Analyze monitoring data from completed special monitoring projects, i.e. AQM/UD, and refine air toxics model, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Commence assessment of model performance based on E-DATAS mobile van measurements by 6/29/07.</li> </ul>
<ul style="list-style-type: none"> <li>• Commence source apportionment analyses for air toxics including residential wood stoves and diesel PM by 6/29/07.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Acquire needed software and hardware to better illustrate the levels of risk.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Identify resources and funding needed to implement risk assessment aspect of DATAS-2009, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Identify resources and funding needed to implement modeling aspect of DATAS-2005, if undertaken.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Acquire needed software and hardware for modeling of DATAS-2005, if undertaken.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Develop modeling protocol for the implementation of DATAS-2005, if undertaken.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Identify resources and funding needed to implement risk assessment aspect of DATAS-2009, 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>• Coordinate review and analysis of 2002 NATA results and facilitate the preparation of DE response, if released by EPA.</li> </ul>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

## 2007 Air Toxics Strategic Plan

### Year 2008

<b>Gather information related to air toxics sources</b>
• Develop emissions inventory protocol for the implementation of the 2008 NEI.
• Develop emissions inventory protocol for the implementation of DATAS-2009, if appropriate.
• Complete 2005 HAPs emissions inventory for area and mobile sources, if needed.
• Complete source apportionment work associated with the DATAS Phase II results.
• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
• Evaluate screening needs and modify the air toxics model to provide a simplified screening tool.

### Year 2008

<b>Identify options for reducing air toxics in the environment</b>
• Continue the implementation of the Wilmington community-based air toxics reduction program.
• Continue to support and participate in the Claymont Industry Partnership Initiative.
• Initiate assessment and prioritize regulatory needs in support of the community air toxics reduction programs.
• 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.
• Complete development and commence implementation of the mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
• Review DATAS Phase II results and identify air toxics reduction activities needed to address potential adverse health impacts.
• If the DATAS Phase II results identify communities facing significant adverse health impacts, prioritize communities to implement a community-based air toxics reduction program, if appropriate. <ul style="list-style-type: none"> <li>• Identify and secure stakeholders interested in participating in the community-based air toxics reduction program.</li> <li>• Working with the stakeholders, identify acceptable meeting dates, times and locations.</li> <li>• Kick-off community-based air toxics reduction program consistent with the stakeholders' schedule.</li> </ul>
• 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>
• Develop a plan to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
• 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 standards.</li> <li>• Newly proposed federal residual risk standards.</li> <li>• Newly proposed federal urban area source standards under Section 112(k).</li> <li>• As each area source standard is being proposed, evaluate the impacts of pollution prevention implementation in that sector.</li> </ul>
• Evaluate the need for the development of additional source category permits to address air toxics issues, ongoing.
• 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>• Working with other branches, identify and pursue funding opportunities for implementing community-based projects.</li> </ul>

## 2007 Air Toxics Strategic Plan

### 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 Best Workplaces for Commuters and SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the Best Workplaces for Commuters and SmartWay Transport programs, as appropriate.</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 air toxics sources in accordance with the applicable compliance monitoring plan.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Implement of the inspection strategy for gasoline delivery vessel's residual risk requirements.</li> <li>• Finalize and issue revised dry cleaner source category permits containing residual risk requirements.</li> <li>• Complete dry cleaning on-site compliance assistance program for the residual risk requirements.</li> <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> </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, as needed, for the trucking industry and report status to EPA R3, if appropriate.</li> <li>• Develop and carryout a public outreach associated with the implementation of the enhanced low inspection and maintenance program in Sussex County.</li> <li>• Continue to conduct anti-idling outreach programs, as needed, for schools.</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>• Continue implementation of education and outreach programs associated with the open burning rulemaking and its implementation.</li> <li>• Continue to work with other State agencies including DPH on air toxics communications and outreaches.</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 the public awareness of actions that the public can take to reduce their risk exposure to air toxics, including appropriate P2 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>• 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> </ul>
<ul style="list-style-type: none"> <li>• Implement a "Smoking Vehicle Reduction Program".               <ul style="list-style-type: none"> <li>• Conduct baseline testing of smoking vehicles.</li> <li>• Develop and carryout "Smoking Vehicle" outreach program.</li> <li>• Establish and implement ongoing compliance and enforcement strategy.</li> </ul> </li> </ul>

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## 2007 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>• Complete annual I/M report and submit report to EPA R3, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Implement the enhanced low inspection and maintenance program in Sussex County.</li> </ul>
<ul style="list-style-type: none"> <li>• Facilitate the implementation of diesel retrofits with school districts.</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, if appropriate, a regulation based on the results of the OTC Clean Corridor project.</li> <li>• Adopt Delaware applicable urban area source standards under Section 112(k) into Regulation 38 prior to federal existing source compliance dates.</li> </ul> </li> <li>• Commence adoption of regulations to reduce unacceptable risks identified in the community air toxics reduction programs.</li> </ul> </li> <li>• Amending existing air toxics rules.               <ul style="list-style-type: none"> <li>• Amend, if appropriate, Delaware Regulation 1145 based on anti-idling model rule for on-road diesel engines.</li> <li>• Amend Regulation 38 by revising Subpart A (General Provisions) considering broadened applicability and changes since original adoption.</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>• Submit Start Action Notice for Subpart N (Chrome plating facilities), if warranted.</li> <li>• Submit Start Action Notice for Subpart T (Halogenated Solvent Degreasers).</li> <li>• Submit Start Action Notice for Subpart RRR (Secondary aluminum smelters), if warranted.</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>• 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>• 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>• 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>
<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>• Identify and pursue potential joint opportunities with the industry and other agencies. Potential new areas include:               <ul style="list-style-type: none"> <li>• Energy Saving Performance Contracting.</li> <li>• Energy Answers Program.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs. Energy efficiency programs include:               <ul style="list-style-type: none"> <li>• Energy efficiency and conservation education.</li> <li>• Building energy codes.</li> <li>• Building energy efficiency.</li> <li>• Energy Star program.</li> <li>• Technical assistance and outreach for residential, commercial, industrial and agricultural customers.</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> <li>• Potential ethanol plant.</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.</li> <li>• Renewable portfolio goals.</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>• Track State energy consumption and costs.</li> <li>• Performance contracting.</li> <li>• Electricity procurement for state-owned facilities.</li> </ul> </li> </ul>

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## 2007 Air Toxics Strategic Plan

### Year 2008

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

- 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.

### 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 for area and mobile sources, if needed.
- 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 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.
  - Encourage broadened participation on energy efficiency, conservation and education training.
  - **Evaluate the need for air toxics-related training for staff and present, as needed.**
- Continue to assist in identifying resources and funding needed to implement DATAS and other air toxics communications and outreaches.
- Develop and implement mechanism(s) to improve air toxics communications.
  - Continue searching for new mechanism(s) to improve air toxics communications between branches.
  - Continue to promote open communications between DNREC and small businesses on air toxics issues.
- Promote open communications between branches, divisions and departments on energy efficiency, conservation and education.

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

**2009**

## 2007 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.</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 implement 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>

## 2007 Air Toxics Strategic Plan

### Year 2009

<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.</li> </ul>
<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 quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to support University of Delaware's special project to provide near real time organic aerosol speciation at MLK monitoring site.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Continue to identify funding requirements and sources needed in order to. . .</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Fully implement our enhanced time-resolution capabilities for VOC measurements</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Potential projects would provide</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Time-integrated air toxics data for air monitoring group.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improve model validation.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as potential information source for SIP development.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Means to investigate predicted air toxics hot-spots throughout state.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as an analytical tool for addressing additional air toxics projects.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Undertake new or special monitoring needs that may surface.</b></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 on control strategies.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Convert emission inventory data into model ready format for DATAS-2005, if undertaken.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Convert meteorological data into model ready format for DATAS-2005, if undertaken.</b></li> </ul>

### Year 2009

<b>Identify potential harm from exposure to air toxics</b>
<ul style="list-style-type: none"> <li>• Characterize the cancer and non-cancer risks through future air toxics assessment programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Coordinate ongoing risk assessment support and guidance of DPH for air toxics control strategy implementation and risk management planning activities.</li> </ul>
<ul style="list-style-type: none"> <li>• Participate in the implementation of DATAS-2009, if undertaken.</li> </ul>
<ul style="list-style-type: none"> <li>• Develop risk assessment aspect for the implementation of DATAS-2009, if appropriate.</li> </ul>

### Year 2009

<b>Gather information related to air toxics sources</b>
<ul style="list-style-type: none"> <li>• Develop emissions inventory protocol for the implementation of DATAS-2009, if appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Identify resources and funding needed to implement emissions inventory aspect of DATAS-2009.</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>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

# 2007 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 to support the implementation of the Wilmington air toxics reduction program.</li></ul>
<ul style="list-style-type: none"><li>• Continue the implementation of the DATAS Phase II community-based air toxics reduction programs.</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>• 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 standards.</li><li>• Newly proposed federal residual risk standards.</li><li>• Newly proposed federal urban area source standards under Section 112(k).</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>• 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>• Working with other branches, identify and pursue funding opportunities for implementing community-based projects.</li></ul></li></ul>

## 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 Best Workplaces for Commuters and SmartWay Transport programs.</li><li>• Report on activities conducted in support of the Best Workplaces for Commuters and 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 air toxics sources in accordance with the applicable compliance monitoring plan.<ul style="list-style-type: none"><li>• Inspect 25% of the dry cleaning facilities.</li><li>• Inspect 25% of the auto body refinishing shops.</li></ul></li><li>• Continue implementation of the inspection strategy for gasoline delivery vessel's residual risk requirements.</li><li>• Incorporate updated MACT and Residual Risk requirements in air permits.</li></ul></li></ul>

Continued on next page

## 2007 Air Toxics Strategic Plan

### Year 2009

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
<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> </ul>
<ul style="list-style-type: none"> <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.</li> </ul>
<ul style="list-style-type: none"> <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.</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.               <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>• 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 a diesel chip reflash regulation, if the voluntary program is unsuccessful.</li> <li>• Adopt Delaware applicable urban area source standards under Section 112(k) into Regulation 38 prior to federal existing source compliance dates.</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>• Amend Regulation 38 Subpart N (Chrome plating facilities), if warranted.</li> <li>• Amend Regulation 38 Subpart T (Halogenated Solvent Degreasers).</li> <li>• Amend Regulation 38 Subpart RRR (Secondary aluminum smelters), if warranted.</li> </ul> </li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Continue 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>
<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 38.</li> </ul>
<ul style="list-style-type: none"> <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>
<ul style="list-style-type: none"> <li>• Evaluate implementation of the “Smoking Vehicle Reduction Program”.</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 with school districts.</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>• Identify and pursue potential joint energy-related opportunities with the industry and other agencies.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement transportation-related energy programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement renewable and advanced energy technologies.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement state facilities energy-related programs.</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>

## 2007 Air Toxics Strategic Plan

### 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.
- 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.

### 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.
  - Encourage broadened participation on energy efficiency, conservation and education training.
  - **Evaluate the need for air toxics-related training for staff and present, as needed.**
- Develop and implement mechanism(s) to improve air toxics communications.
  - Continue to implement newly found mechanism(s) to improve air toxics communications between branches.
  - Continue to promote open communications between DNREC and small businesses on air toxics issues.
- Promote open communications between branches, divisions and departments on energy efficiency, conservation and education.

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

**2010**

## 2007 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>• Coordinate development of the 2010 Air Toxics Strategic Plan (ATSP) including incorporation of DATAS results and community activity needs.</li><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 implement 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>

## 2007 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 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 identify funding requirements and sources needed in order to. . .</li> </ul> </li> <li>• <b>Fully implement our enhanced time-resolution capabilities for VOC measurements</b> <ul style="list-style-type: none"> <li>• <b>Potential projects would provide</b> <ul style="list-style-type: none"> <li>• <b>Time-integrated air toxics data for air monitoring group.</b></li> <li>• <b>Improve model validation.</b></li> <li>• <b>Serve as potential information source for SIP development.</b></li> <li>• <b>Means to investigate predicted air toxics hot-spots throughout state.</b></li> <li>• <b>Serve as an analytical tool for addressing additional air toxics projects.</b></li> </ul> </li> <li>• <b>Undertake new or special monitoring needs that may surface.</b></li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Develop modeling protocol for the implementation of DATAS-2009.</li> <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) based on DATAS-2005 emissions inventory, 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 on control strategies.</li> </ul>

### Year 2010

<b>Identify potential harm from exposure to air toxics</b>
<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 control strategy implementation and risk management planning activities.</li> <li>• Finalize risk assessment aspect for the implementation of DATAS-2009, if appropriate.</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> <li>• <b>Revise 2008 HAP emissions inventory for DATAS-2009.</b></li> <li>• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.</li> </ul>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

## 2007 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 the implementation of the DATAS Phase II community-based air toxics reduction programs.</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 standards.</li> <li>• Newly proposed federal residual risk standards.</li> <li>• Newly proposed federal urban area source standards under Section 112(k).</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>• Working with other branches, identify and pursue funding opportunities for implementing community-based projects.</li> </ul> </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>• 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 Best Workplaces for Commuters and SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the Best Workplaces for Commuters and 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 air toxics sources in accordance with the applicable compliance monitoring plan.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Implement of the inspection strategy for gasoline delivery vessel's residual risk requirements.</li> <li>• Incorporate updated MACT and Residual Risk requirements in air permits.</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, as needed, for the trucking industry and report status to EPA R3 on 3/15, 6/30, 9/30 and 12/31.</li> </ul> </li> </ul>

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## 2007 Air Toxics Strategic Plan

### Year 2010

<b>Implement appropriate actions to reduce the harm from exposure to air toxics – cont.</b>
• Provide support to Small Businesses on air toxics related issues.
• 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.
• Continue to coordinate implementation of area source protocol when area source standards are promulgated, if needed.
• 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.
• Adopt new and amend existing air toxics regulations for mobile and stationary sources.
• Adopt applicable area source residual risk standards into Regulation 38 prior to federal existing source compliance dates, if needed.
• Adopt Delaware applicable urban area source standards under Section 112(k) into Regulation 38 prior to federal existing source compliance dates.
• Continue 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.
• As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between AQM and small businesses.
• If warranted, prepare delegation packages and request delegation of authority for changes adopted for area source standards in Regulation 38.
• Complete annual I/M report and submit report to EPA R3, if appropriate.
• Facilitate the implementation of diesel retrofits with school districts.
• Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
• Identify and pursue potential joint energy-related opportunities with the industry and other agencies.
• Continue to identify and implement energy efficiency programs.
• Continue to identify and implement transportation-related energy programs.
• Continue to identify and implement renewable and advanced energy technologies.
• Continue to identify and implement state facilities energy-related programs.
• 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.

### Year 2010

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>
• Submit 2008 NEI for HAPs, if required, by 6/1/10.
• Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
• <b>Revise 2008 HAP emissions inventory for DATAS-2009.</b>
• Continue tracking the “air toxics indicators”, if found.
• 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.

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

## 2007 Air Toxics Strategic Plan

### Year 2010

#### **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.
  - Encourage broadened participation on energy efficiency, conservation and education training.
  - **Evaluate the need for air toxics-related training for staff and present, as needed.**
- Develop and implement mechanism(s) to improve air toxics communications.
  - Continue to implement newly found mechanism(s) to improve air toxics communications between branches.
  - Continue to promote open communications between DNREC and small businesses on air toxics issues.
- Promote open communications between branches, divisions and departments on energy efficiency, conservation and education.

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

**2011**

# 2007 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.</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 2010 Air Toxics Strategic Plan.</li> </ul>
<ul style="list-style-type: none"> <li>• Review status and complete mid-year status report on the 2011 individual Strategic Plans.</li> </ul>
<ul style="list-style-type: none"> <li>• Track implementation and report mid-year status on the 2011 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>• Coordinate development of the 2012 Air Toxics Strategic Plan (ATSP) including incorporation of DATAS results and community activity needs.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Update individual Strategic Plans for 2012-2016.</li> </ul>
<ul style="list-style-type: none"> <li>• Update and finalize 2012 Air Toxics Strategic Plan for years 2012 to 2016.</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 implement 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.</li> </ul>
<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 quarterly air toxics monitoring data to national AIRS-AQS database following data validation.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify funding requirements and sources needed in order to . . .</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Fully implement our enhanced time-resolution capabilities for VOC measurements</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Potential projects would provide</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Time-integrated air toxics data for air monitoring group.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Improve model validation.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as potential information source for SIP development.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Means to investigate predicted air toxics hot-spots throughout state.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Serve as an analytical tool for addressing additional air toxics projects.</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Undertake new or special monitoring needs that may surface.</b></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 on control strategies.</li> </ul>

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**

## 2007 Air Toxics Strategic Plan

### Year 2011

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

- Characterize the cancer and non-cancer risks through future air toxics assessment programs.

### Year 2011

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

- Develop emissions inventory protocol for the implementation of the 2011 NEI, if needed.
- Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.

### Year 2011

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

- 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.
- Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
  - 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.
  - 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.
- Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
- 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.
  - Newly proposed amendments to federal MACT standards.
  - Newly proposed federal residual risk standards.
  - Newly proposed federal urban area source standards under Section 112(k).
  - As each area source standard is being proposed, evaluate the impacts of pollution prevention implementation in that sector.
- Implement other air toxics-related communications and outreach programs.
  - Continue to participate in community/industrial air toxics outreaches and evaluate new opportunities.
  - Continue to support Engineering and Compliance's community/industrial air toxics outreach programs.
- Identify grant and funding opportunities.
  - Facilitate the identification, preparation and submission for transportation-related grants or other funding.
  - Working with other branches, identify and pursue funding opportunities for implementing community-based projects.

## 2007 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 Best Workplaces for Commuters and SmartWay Transport programs.</li> <li>• Report on activities conducted in support of the Best Workplaces for Commuters and 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 air toxics sources in accordance with the applicable compliance monitoring plan.</li> <li>• Inspect 25% of the dry cleaning facilities.</li> <li>• Inspect 25% of the auto body refinishing shops.</li> <li>• Implement of the inspection strategy for gasoline delivery vessel's residual risk requirements.</li> <li>• Incorporate updated MACT and Residual Risk requirements in air permits.</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.</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 urban area source standards under Section 112(k) into Regulation 38 prior to federal existing sources compliance dates, if needed.</li> <li>• Continue 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>• 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 with school districts.</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>• Identify and pursue potential joint energy-related opportunities with the industry and other agencies.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement energy efficiency programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement transportation-related energy programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement renewable and advanced energy technologies.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to identify and implement state facilities energy-related programs.</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>

## 2007 Air Toxics Strategic Plan

### Year 2011

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>
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| <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 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>
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| <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>• Encourage broadened participation on energy efficiency, conservation and education training.</li></ul></li><li>• <b>Evaluate the need for air toxics-related training for staff and present, as needed.</b></li></ul> |
| <ul style="list-style-type: none"><li>• Develop and implement mechanism(s) to improve air toxics communications.<ul style="list-style-type: none"><li>• Continue to implement newly found mechanism(s) 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>  |
| <ul style="list-style-type: none"><li>• Promote open communications between branches, divisions and departments on energy efficiency, conservation and education.</li></ul>   |

**Bold activities are ones for which additional funding and/or personnel will be needed before undertaking**