

**FORSYTH COUNTY OFFICE OF ENVIRONMENTAL ASSISTANCE AND
PROTECTION (FCEAP)
SUMMARY REPORT FOR FY 2014 FEDERAL GRANT
ID # 14-15**

FCEAP has met all of its grant commitments and outputs\inputs prescribed in the FY14 Air Planning Agreement. Following are some of the highlights performed by FCEAP during this period.

Protecting and Improving Air Quality

Forsyth County continues to maintain and improve its ambient monitoring network. The County's ambient monitoring network includes continuous carbon monoxide, sulfur dioxide, oxides of nitrogen, ozone, PM 10, PM 2.5 (TEOM and FEM) and periodic PM 2.5 monitors. The collection efficiency and all monitoring data has been quality assured and reported to U.S. EPA.

In March, 2008, EPA revised the ozone standard to be more health protective. The standard was lowered, with a number of monitors across the area exceeding the new standard. The 3-year average of ozone levels in Forsyth County (2011, 2012, and 2013) shows none of the monitors violated the current standard. Using the most recent quarterly data, Forsyth County continues to attain the PM 2.5 Ambient Air Quality Standard. The tighter PM 2.5 standard issued in December 2007 did not immediately impact Forsyth County. The area remains in attainment for PM 2.5.

FCEAP operates all criteria pollutant monitors and performs requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other EPA guidelines. All air monitoring data is quality assured and is entered into the Air Quality System. Data collection and completeness for each pollutant exceeded 75% and most monitors exceeded 90%

FCEAP is creating and updating its air monitoring program's Quality Assurance Project Plan (QAPP) and Standard Operating Procedures (SOPs) to be consistent with all requirements outlined in 40 CFR Parts 50, 53, and 58, as well as with federal guidelines for Air Pollution Measurement Systems (EPA/454/B-13-003), EPA designated Federal Reference Methods, and Federal quality assurance requirements.

FCEAP develops the Air Quality Index based on all criteria pollutants, but is primarily focused on PM2.5 and Ozone for the Winston-Salem, High Point, and Greensboro area. It is sent daily to the regional newspapers, television stations, EPA AIRNow website and is updated on the FCEAP web page daily.

FCEAP adopted rule changes shortly after their adoption by North Carolina. The Local Implementation Plan updates followed EPA's guidelines and will be submitted to North Carolina for inclusion into the SIP. North Carolina will forward FCEAP's modified rules and regulations to EPA.

FCEAP actively participated in the transportation conformity process, including the following activities: consulted with appropriate transportation and air quality partners on development of motor vehicle emissions budgets; participated in the interagency consultation process; continued to develop relationships with transportation partners. FCEAP adopts by reference into our local Air Quality Code all conformity SIPs promulgated by the N.C Department of Environment and Natural Resources relevant to Forsyth County.

During FY 2014, FCEAP continued implementing its NSR/PSD program, which is fully approved and complies with the CAA requirements. The Office follows EPA policy and guidance including limiting potential to emit, top-down BACT determinations, stack height restrictions, and transitional issues associated with the 1990 Clean Air Act Amendments. FCEAP's NSR/PSD program includes notifications to Region 4 and other potentially affected parties including Federal Land Managers for Class I Areas in North Carolina and Virginia. FCEAP also provides EPA Region 4 a copy of all preliminary determinations and supporting materials prior to the public notice date, as well as the final preconstruction permit and final determination. This information is also made available to Federal Land Managers and any other interested parties.

FCEAP did not receive or process any PSD or NSR permit applications during FY 2014. This Office will continue to process applications consistent with our approved PSD/NSR program and information will be provided to the RBLC.

FCEAP continues to implement a minor NSR program which follows EPA policies and guidance. One purpose of this program is to establish limitations on potential to emit (PTE) to avoid major NSR/PSD permit requirements. All limitations on potential to emit in permits issued by FCEAP are enforceable as a practical matter. In addition, EPA Region 4 is notified of, and given opportunity to comment on, all permits processed by FCEAP that establish limits on PTE at major sources through the Significant Modification process under the Title V program. The number of significant and other modifications processed by FCEAP is reported to EPA Region 4 on a regular basis.

FCEAP continues to explore flexible permit opportunities. While all permits are designed to provide as much flexibility as possible (within regulatory requirements), FCEAP remains receptive to flexibility proposals from EPA.

FCEAP has an active and effective open burning enforcement program. Enforcement, along with outreach materials such as tax listing inserts and pamphlets, help to reduce illegal open burning and its impact on air quality in Forsyth County.

Reduce Air Toxics

FCEAP continues to collect and review Emission Inventory data in accordance to its approved QAPP. FCEAP completed the entry of Criteria and Hazardous Air Pollutant (HAP) emissions for CY 2012 from all major and other targeted permitted sources by the December 2013 deadline.

All data was submitted through EPA's Exchange Network Client for final entry into EPA's Emissions Inventory System (EIS). In February 2014, FCEAP supplied the facilities with appropriate emissions inventory reporting forms as well as digital copies of the in-house MS Access database in order to collect and enter emissions inventories for CY 2013. CY 2013 data was collected from all major and maintenance area sources (> 25 tpy of NO_x or VOC) as well as smaller permitted sources coinciding with their permit renewal dates. Review and entry of 2013 data is in progress. Title V facilities and facilities emitting 25 tons per year or more of nitrogen oxides or volatile organic compounds are required to submit inventories annually.

Forsyth County worked closely with the NC Division of Air Quality in the air toxic monitoring program. FCEAP operated an air toxic monitoring site at Hattie Avenue, collected an air toxic sample every six (6) days and forwarded the air toxic samples to NCDENR bimonthly for analysis.

FCEAP has assumed implementation for all promulgated Part 63 NESHAP (MACT) standards for both major and minor sources. All Title V permits have applicable MACT requirements incorporated into their permits as do non Title V permits for area sources subject to MACT requirements. FCEAP will continue to provide information to Region 4 upon request. FCEAP implements the 112(r) program for all area and Title V sources in accordance with the implementation plan. There is currently one facility subject to the 112(r) program in Forsyth County

During FY 2013, FCEAP made no 112(g) determinations. FCEAP has implemented a procedure to track and report 112(g) determinations as well as approved alternatives to all monitoring, testing, record keeping and reporting requirements made for sources subject to MACT standards.

FCEAP requires all sources subject to Part 63 Subpart M (Dry Cleaners using Perchloroethylene) and Part 63 Subpart CCCCCC (Gasoline Dispensing Facilities) to register with our Office. Dry Cleaners and Gasoline Dispensing Facilities are inspected annually.

FCEAP is also implementing area source MACT standards including, Subpart ZZZZ-Internal Combustion Engines, Subpart WWWW-Hospital EtO Sterilizers, Subpart HHHHHH-Paint Stripping & Misc Coating Operations, Subpart XXXXXX-Metal Fabrication and Finishing,

Subpart WWWW-Plating and Polishing, Subpart JJJJJ-Industrial, Commercial, and Institutional Boilers, and others as resources allow. Registrations and notifications of compliance are complete for all HHHHH sources.

FCEAP Air Quality Code automatically adopts NSPS, NESHAP and MACT standards. FCEAP adopted other local or state rules which will be submitted to U.S. EPA.

Where appropriate, FCEAP has participated in rules and standards development.

Healthier Indoor Air

FCEAP answers all indoor air questions and provides information to the public on indoor air quality through brochures, our web page (<http://www.forsyth.cc/EAP>) and consultative site visits.

FCEAP provides indoor air booklets and pamphlets to the public upon request. Recently the main indoor quality concern has been mold in residences. FCEAP provides information to the public on mold and the remediation of mold contamination.

FCEAP provides a radon testing program by providing short and long-term test kits to the Forsyth County residents at a minimum cost. The results from the tests are returned to FCEAP. A staff member contacts the home-owner to review the test results and answers questions regarding mitigation if needed. FCEAP maintains a database of all radon test results.

Reduce Greenhouse Gas Intensity

FCEAP stayed current on regulatory developments on the regulation of GHGs and participated in stakeholder activities with Region 4.

FCEAP has provided guidance and leadership towards helping the County develop an efficient energy management program. The County Manager has assigned the General Services Department the lead in developing an Energy Management Program. FCEAP has partnered with General Services to assist with technical information related to air pollution as well as writing the quarterly newsletter and sending out monthly energy tips to Forsyth County personnel. Two staff members of FCEAP are active members of the County's Energy Management Team. FCEAP continues to promote the "no idling" policy that was reviewed by all Departments and implemented by the County Manager on a county-wide basis in FY 2009. Additionally, FCEAP's Air Awareness Program easily integrates energy saving efforts into its existing program information due to the relationship between air pollution and energy usage.

Compliance Incentives

FCEAP's compliance assistance activities relied on the use of the Office's website. Our staff also assisted permitted sources and non permitted small businesses with technical and environmental compliance assistance and referrals. As part of this effort, FCEAP maintains compliance assistance web pages for facilities affected by Subpart M, Dry Cleaning Facilities, Subpart CCCCCC, Gasoline Facilities, Subpart HHHHHH, Paint Stripping & Misc Coating Operations, Subpart JJJJJJ Area Source Boilers, and Subpart ZZZZ Stationary Engines and Emergency Generators.

Self-disclosure of violations by the regulated community is encouraged by the Office's penalty matrix which provides substantial penalty reductions for self-reported violations that were not otherwise required to be reported.

The Department provides compliance incentives to sources by using air quality awards for recognition of compliance during the previous year in addition to special awards for environmental projects deserving additional recognition.

Monitoring and Enforcement

FCEAP is a direct user of AIRS and entered/updated information into AFS monthly. FCEAP has successfully transitioned its data from the AFS system to the new ICIS system and is currently using ICIS for entry of compliance data. FCEAP currently provides information on enforcement actions, CMS and MACT inspections, Title V permits, and stack test data to ICIS.

FCEAP continues to process enforcement actions in accordance with the most current Compliance Assurance Agreement signed by FCEAP and Region IV. Enforcement actions in FY 2014 were processed according to the T&A guidance and required data were entered into AFS up until the switch to ICIS in November 2014. Compliance schedules are tracked internally and Region 4 is advised on enforcement actions through monthly conference calls. All violations were processed in accordance with the Compliance Assurance Agreement. This includes SIP, PSD, and NSR related enforcement actions. FCEAP did not have any enforcement cases in FY 2014 that were appropriate for referral to EPA Criminal Enforcement Program.

FCEAP submitted a biennial Compliance Monitoring/Inspection Plan to EPA Region 4 in February 2014 for fiscal years 2014 and 2015. The inspection plan included Full Compliance Evaluations for Title V facilities, synthetic minor facilities, NSPS affected facilities, NESHAP affected facilities, and other facilities in accordance with the EPA's revised Compliance Monitoring Strategy issued in June 2001. All inspections scheduled for FY 2014 were completed or otherwise accounted for in accordance with the revised Compliance Monitoring Strategy (CMS, April 25, 2001). FCEAP continues to train staff according to our Inspection and Compliance Evaluation Quality Assurance Plan to ensure the compliance monitoring program

remains effective.

FCEAP maintains a link to the NCDENR Division of Environmental Assistance and Customer Service web page.

FCEAP inspected all removal contractors and greater than 90% of all NESHAP asbestos demolition/renovation projects and verified AHERA certifications of the contractors and their employees. FCEAP inspects the majority of renovation projects while in progress to observe the asbestos work practices utilized by the contractors. Since the ACTS/NARS tracking and reporting system is no longer active, FCEAP reports all asbestos demolition/renovation information to U.S. EPA quarterly. FCEAP utilizes its civil penalty policy which is approved by EPA to deter future violations. FCEAP maintains a health and safety plan for asbestos inspectors and provides an annual physical examination for each employee inspecting asbestos demolition/renovation projects.

Since there were no affected Acid Rain stationary sources in Forsyth County during FY 2012, FCEAP was not required to administer any parts of the acid rain program. If a stationary source becomes affected in the future, FC and consultative site visits. FCEAP is prepared to enforce the acid rain rules.

Cross Cutting Issues:

Ambient Monitoring - FCEAP worked closely with U.S. EPA in designing and maintaining its monitoring network. The monitoring network is designed and operated in accordance with EPA guidelines and protocol. FCEAP has complied with all ambient monitoring grant conditions.

Environmental Justice - The Office continues to follow environmental justice issues as they may affect the air quality program implementation and also continues to actively explore ways to address environmental justice concerns proactively. The Department created and continues to circulate a brochure, written in Spanish, to assist with the County's open burning ordinance among the Hispanic population. Additionally, the Department reviews Brownfield Development plans to provide an extra level of review to help assure that each site will pose no harm to citizens in the surrounding area. Many of these areas tend to be inhabited by minority populations.

Pollution Prevention (P2) - During FY 2013, FCEAP continued to administer its P2 program as resources allowed and worked cooperatively with the Air Awareness Program to provide support for technical and basic outreach to permitted sources, and encourage permitted sources to become a part of the Air Awareness Business Coalition. As part of this effort, FCEAP inspectors discuss pollution prevention and energy conservation during site visits.

Training - The Office makes every effort to keep its staff trained and up to date, taking advantage of training opportunities offered at locations primarily in Region 4 as well as distance

learning opportunities provided through webinars and the internet. FCEAP especially appreciates the efforts made by Metro4/SESARM to increase training opportunities in Region 4. In addition to multiple training activities, FCEAP sent staff to the Region 4 Ambient Air Monitoring Workshop and the National AQS conference as specifically mentioned in the APA.

Energy - In FY 2013-14, the Forsyth County Office of Environmental Assistance and Protection (FCEAP) participated in the County's Energy Management Program (EMP) and was responsible for publishing monthly tips for county employees as well as four quarterly newsletters. Attached are the four newsletters published in FY 2013-14. Monthly tips are sent via email and include recommendations for employees to consider to save money and energy. The Government Center tracks energy usage in a software application separate from Portfolio Manager. FCEAP energy usage is incorporated into that system.

All grant commitments and outputs/outcomes established in the work plan have been met. FCEAP completed its Air Planning Agreement for FY 2015 by the August 1, 2014 deadline.