



MECKLENBURG COUNTY
Land Use and Environmental Services Agency
- AIR QUALITY -

December 29, 2014

Ms. Beverly Banister, Director
Air, Pesticides & Toxic Management Division
U.S. Environmental Protection Agency
Region IV
Atlanta Federal Center
61 Forsyth St., S.W.
Atlanta, GA 30303

RE: CAA Section 105 Grant Commitments: FY 2014
Mecklenburg County Air Quality Program

Dear Ms. Banister:

Mecklenburg County Air Quality ("MCAQ") provides the following information as required by its FY 2014 grant commitments. According to the category title "Cross Cutting Issues", Item 4, the agency is to submit an annual report that addresses each area of the work plan, highlighting accomplishments, outputs and outcomes, and other pertinent information. In FY14, MCAQ met all its commitments and outputs/outcomes under EPA's Strategic Plan Goals and Objectives. The following is a listing of the various areas identified in the work plan and a discussion of related activity.

"Protecting and Improving Air Quality"

NAAQS Cross Cutting

Implement Mobile Source Programs

The activities related to the above commitments were conducted with the State in the lead with MCAQ in a secondary role to assist where appropriate. MCAQ participated in the planning process, provided comments, prepared the point source emission inventories, participated in the transportation conformity process, adopted the regulations in a timely manner, and collaboratively worked with other agencies to meet all the requirements.

Implement NSR Programs

MCAQ did not issue any PSD or NSR-nonattainment permits during FY14.

MCAQ adopted State rules by reference that addressed modifications to NSR.

MCAQ did not have any PSD/NSR applicability determinations that resulted in non-applicability. MCAQ did not issue any permits in which the facilities assumed limits to avoid PSD/NSR during FY14.

Ambient Air Monitoring

MCAQ conducted all the activities of this section as agreed upon in the grant commitments. A listing of activities is as follows:

- MCAQ operated all criteria monitors, performing data review and QA/QC in compliance with the CFR requirements.
- MCAQ developed and submitted an ambient monitoring network plan and coordinated with NCDAQ in the submission of a statewide ambient monitoring network plan.
- Revisions to the Standard Operating Procedure (SOP) for ambient monitoring were submitted to Region 4 by electronic format.

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- An equipment evaluation of the ambient monitors was submitted to Region 4 on October 14, 2014, as an appendix to the 2014 Annual Monitoring Network Plan (MCAQ).
- Mecklenburg County ozone monitoring sites complied with the 1997 8-hour ozone standard based on data collected for the period 2012-2014.
- MCAQ participated in reporting data to the Ozone Mapping Program.
- MCAQ complied with appropriate guidance in flagging data as having been influenced by exceptional events. MCAQ flagged data in accordance with the EPA issued final rule of March 22, 2007, entitled "Treatment of Data Influenced by Exceptional Events". Flags applied to FY14 data were placed for information only. MCAQ did not request EPA concurrence for informational flags.
- MCAQ participated in the EPA AIRNOW website, the AQI and Air Quality Forecast by submitting data to State Air Quality.
- Participant was sent to the Region 4 Ambient Air Monitoring Workshop.
- Criteria air pollutant data completeness requirements were met.

"Reduce Air Toxics"

MCAQ collected ambient air toxic samples on behalf of NCDAQ at the Garinger High School (37-119-0041) monitoring site. Field maintenance, field QA/QC and data submission activities were coordinated with NCDAQ. NCDAQ performed sample analysis and the majority of the associated QA/QC. MCAQ submitted data to Region 4 as it was made available by the state.

MCAQ implemented promulgated MACT and residual risk standards through permitting, compliance, and enforcement. MCAQ continued to implement its Area Source MACT program by incorporating the new rules into each subject facility's permit, and conducting compliance outreach efforts as listed below.

There were no instances of 112(g) case-by-case MACT determinations during FY14, nor were any monitoring, testing, recordkeeping, or reporting requirements exercised that were alternative to those of the various MACTs.

"Monitoring and Enforcement"

MCAQ entered compliance and enforcement information into AIRS Facility Subsystem (AFS) regarding permitted facilities on a regular and consistent basis. Violations were resolved for rules delegated to MCAQ by EPA for all categories of sources (Title V, Synthetic Minor, MACT, NSPS, etc.)

On a limited basis, MCAQ used the pollution prevention database as a resource to enhance outreach, as well as the UNC-Charlotte Environmental Assistance Program.

In FY14, MCAQ received 423 asbestos NESHAP notifications, and conducted 267 initial inspections, and 19 follow up inspections. MCAQ inspected more than the required 25% of NESHAP demolition/renovation projects, observing work practices in progress and observing each contractor a minimum of once during the year.

Three notices of violations (NOV) were issued to asbestos NESHAP violators; one of the violations resulted in a civil penalty assessment. A summary of these activities was submitted to Region 4 semi-annually using the format listed in the work plan. MCAQ did not have any cases that warranted recommending to the EPA Criminal Enforcement Program.

MCAQ implemented the 112(r) program during FY14 and made six inspections. A report dated November 14, 2014, of 112(r) activities was submitted to Ms. Deanne Grant of Region 4, and is attached here.

MCAQ conducted various compliance assistance activities in FY14 including:

- One annual meeting with permitted stationary sources;

- One workshop to provide training regarding the permitting and compliance requirements for combustion sources;
 - Compliance assistance equipment inspection guide and checklist for Stage I facilities were updated;
 - Compliance assistance asbestos NESHAP brochure and NESHAP notification forms for contractors applying for demolition/renovation permits with the county were updated and provided to the new Mecklenburg County Code Enforcement Customer Service Center; and,
 - Compliance email reminders were sent for various reports and fee submittals, regulation updates, etc.
- Please see attached report for detailed information.

MCAQ encourages self-disclosure of violations generally through penalty negotiations. Compliance incentives have been implemented for non-major sources.

“Cross Cutting Issues”

Emissions Inventories

MCAQ submitted the 2012 criteria and hazardous emissions inventory for all applicable point sources to EPA through the EIS Gateway as required.

Planning

With the submittal of this report and its attachments, MCAQ will have submitted all required reports for FY14.

Staff Technical Training:

MCAQ sent 24 attendees to 19 different off-site training events and had 38 participants in 22 different electronic training offerings. A detailed list is attached.

Should you have any questions regarding this information, please contact Jason Rayfield of my staff at 704-336-5430.

Sincerely,



Leslie Rhodes
Director

LHR:isp

Enclosures (3): FY14 Compliance Assistance Activities Report
FY14 112(r) Annual Report & FY2015 Work Plan
FY14 Staff Training List

cc: Stuart Perry (USEPA4)
Jason Rayfield
Chuck Greco
Lexin Murphy



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**Compliance Assistance Activities Report
FY 2014**

During the months of October 2013 through September 2014, Mecklenburg County Air Quality (MCAQ) conducted the following compliance assistance activities:

Annual Stationary Source Meeting - November 2013

On November 7, 2013, MCAQ conducted its annual meeting. All Mecklenburg County permitted stationary source contacts were invited. Information regarding federal, state, and local regulation updates and air quality issues were the focus of the meeting. Mr. R. Scott Davis, Air Planning Branch Chief, Region 4 USEPA, gave a presentation regarding updates to the federal and regional air quality programs and plans. Mr. Mike Abraczinskas, Deputy Director, NCDAQ, gave a presentation regarding updates to state air quality programs and plans relevant to the Mecklenburg County region. Mr. Marcus Hackler, Environmental Coordinator, The Lane Construction Corporation, gave a presentation regarding air quality compliance from a permitted facility's perspective. During the meeting, the latest monitoring data for criteria pollutants, recent rule revisions, and facility permitting and enforcement issues were presented, as well as a discussion of MCAQ's Grade (Grants to Replace Aging Diesel Engines) program and other emission reduction programs that target mobile sources. This meeting was well attended and provided a great opportunity for facility environmental representatives to speak directly to MCAQ representatives.

Stationary Source Permitting and Compliance Workshop – May 2014

On May 15, 2014, MCAQ held a workshop on combustion source permitting and compliance. All the permitted stationary source contacts were invited. Information regarding federal, state, and local regulation updates and air quality issues were the focus of the meeting. Presentations by MCAQ included emission calculations and permitting requirements for combustion sources, updates to the federal regulations for boilers and reciprocating internal combustion engines (RICE), and updates to the state toxics regulations. Mr. Dwayne Beaver, C & C Boiler, gave a presentation on boiler tune-ups and best combustion practices. Breakout sessions were held for both boilers and RICE to better address questions in a small group setting. This meeting was well attended and provided a great opportunity for facility representatives to speak directly to MCAQ representatives on compliance and permitting questions and issues.

Compliance Outreach - Gasoline Service Stations

Compliance assistance documents were revised/updated for the Stage I regulated community including an equipment inspection guide and inspection checklist. Copies of the guide and checklist are included in the permit packages for each new Stage I facility, and given to each existing permitted Stage I facility when the facility is inspected. Both revised documents were also posted on the Stage I section of the MCAQ website.

Compliance Outreach – Asbestos NESHAP

The NESHAP notification forms and compliance assistance brochure developed to help contractors understand their requirements for submitting notifications, for work practices in handling asbestos containing materials, and for waste disposal under the NESHAP regulation were updated. The updated documents were provided to Mecklenburg County Code Enforcement for use in its new Customer Service Center. The updated documents were also posted on the asbestos NESHAP section of the MCAQ website.

Air Quality Newsletter – March 2014

MCAQ published AirWaves - a newsletter that discusses current air quality issues. On March 12, 2014,

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AirWaves was emailed to the permitted stationary facilities, government officials, and the public library. The newsletter provided articles highlighting updates to state air quality programs and plans relevant to the Mecklenburg County area, Mecklenburg County's ambient air monitoring update for 2013, as well as an update on facility permitting and enforcement issues.

Air Quality Commission (AQC) Meeting- Monthly

The Commission is selected by the Mecklenburg County Board of County Commissioners. Though the AQC has no formal power on permitting and compliance issues and their approval is not required for MCAQ actions, they do preside as hearing officers regarding appeals. Their monthly meeting serves as the place for public comment and public meetings regarding proposed permits. MCAQ often makes presentations at this meeting and did so during FY14. Issues presented often involve new regulations and requirements as well as compliance topics.

Individual meetings with permitted facilities - as requested/required

MCAQ meets as requested with facilities to discuss air quality issues. Being a local program, MCAQ is a local call and many times less than an hour from the facility. During FY14, MCAQ took advantage of several opportunities to discuss issues with facilities, proactively preventing a number of potential compliance violations.

Compliance Reminders

Various email reminders were sent out regarding the annual emissions report due date, compliance certification due dates, the annual fee submittal due date, local air pollution control ordinance updates, the latest versions of regulations, etc., to give facilities the best chance at meeting their compliance requirements.

UNCC Environmental Assistance Office

The University of North Carolina Charlotte has an Environmental Assistance Office that also promotes air quality compliance. This office works with facilities under the stipulation that they are not required to advise MCAQ of possible air quality concerns. In addition, in FY14, this office helped MCAQ with two projects: they conducted an air toxics and environmental justice GIS analysis, providing mapping data as well as a final report summary, and performed an assessment of the effectiveness of personal air monitors.

The above are just a sampling of the activities MCAQ conducted hoping to reduce enforcement actions.



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November 14, 2014

**FY2014 CAA 112(r) END-OF-YEAR REPORT
FY2015 WORK PLAN**

BACKGROUND

- Mecklenburg County Air Quality (MCAQ) received full delegation for the 112(r) Chemical Accident Prevention Program from USEPA on March 19, 2003.
- There are 24 Mecklenburg County stationary sources currently subject to the rule; 6 additional stationary sources are in deregistered status. Of the 24 facilities, 15 have air quality permits, 2 are registered air emission sources, and 7 are not required to have an air quality permit.

FY2014 SUMMARY

- In FY2014, six Mecklenburg County 112(r) RMP (Risk Management Plan) facilities were inspected as detailed below:

Facility	Inspection Date	Inspection Result
Mallard Creek Polymers, Inc.	12/11/2013	112(r) compliant
Rohm and Haas Company - Charlotte Plant	2/20/2014	112(r) compliant
DPC Enterprises, LP	5/21/2014	112(r) compliant
Snyder Production Center; Coca-Cola Bottling Co. Consolidated	6/25/2014	112(r) compliant
Vest Water Treatment Plant; Charlotte-Mecklenburg Utilities	8/26/2014	Review in progress; pending report
Motiva Enterprises, LLC-Charlotte (North)	9/25/2014	Review in progress; pending report

The above inspections represent 25% of the active Mecklenburg County RMP facilities.

- In FY2014, MCAQ completed its second 5-year cycle of 112(r) inspections, during which 100% of facilities in the county subject to 112(r) were inspected.
- MCAQ used an inspection checklist patterned after the RMP Inspection Checklist (Annex D) included in the "Guidance for Conducting Risk Management Program Inspections under Clean Air Act Section 112(r)" dated January, 2011. The RMP Inspection Checklist was tailored to meet MCAQ program inspection needs.
- Three MCAQ persons were involved in the 112(r) program this year and participated in the inspections, documentation, and enforcement actions.
- MCAQ participated in the EPA 112(r) Region 4 RMP Conference Calls and the North Carolina Department of Air Quality 112(r) Task Force meetings during FY2014.
- MCAQ participated in an information and planning meeting with the Charlotte Fire Department, Charlotte-Mecklenburg Emergency Management, and the NC Division of Emergency Management regarding the NC Regional Hazardous Materials Study in the greater Charlotte/Mecklenburg area.

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FY2015 WORK PLAN

- MCAQ will inspect the following 112(r) RMP facilities during FY2015:

Facility	Scheduled Inspection
IGM Resins	1 st Quarter
JCI, Jones Chemical Incorporated	2 nd Quarter
BIC Consumer Products Mfg. Co, Inc. - Distribution	3 rd Quarter
BIC USA, Inc. Packaging	3 rd Quarter
Emerald Carolina Chemical, LLC	4 th Quarter

- The MCAQ 112(r) program goal is to complete inspections of all RMP facilities in the county on a 5-year cycle. FY15 is the start of a new 5-year cycle for MCAQ and the inspection schedule above results in a 20.8% inspection rate (not including deregistered facilities) for the year.
- Inspection priority includes the EPA guideline to inspect 36% of the high risk facilities annually. Mecklenburg County has only one 112(r) High-Risk facility on the EPA FY2014 RMP High-Risk Facilities list, JCI, Jones Chemicals, Incorporated (JCI), which was inspected in FY2012. JCI is included in the FY2015 schedule above. MCAQ plans to inspect this facility on a 3-year basis.
- Continue to participate in EPA Region 4 RMP Conference Calls and the North Carolina Department of Air Quality 112(r) Task Force meetings.
- Continue to provide RMP outreach and compliance assistance to other county stationary sources as requested.

Please address any questions to the MCAQ 112(r) Program Coordinator, Mr. Richard Nelson, at (704) 336-6865 or via e-mail at: Richard.Nelson@MecklenburgCountyNC.gov.

FY 2014 MCAQ Training

Date(s)	Training	# of Attendees	Location	Attending
10/2/2013	Transcat: Pressure Calibration	1	Webinar	KG
10/15-18/2014	Thermoenvironmental Training Class G100	1	Franklin MA	SH
10/16-18/2013	CAPCA: Fall Meeting	1	Myrtle Beach, SC	CG
10/24/2013	Vaisala: Meteorological Applications of Lightning Data	1	Webinar	KG
10/29-31/2014	EPA R4: Air Directors Workshop	2	Charleston, SC	JR, LR
11/13/2013	EPA: Boiler GACT Rule	4	Webinar	ES, AM, DC, SL
11/21/2013	ORIS: Screening Modeling using BEE-Line Aerscreen	3	Webinar	AM, DC, SL
11/27/2013	APTI 422: Air Pollution Control Orientation	1	Online	LM
12/9-11/2013	APTI 400: Introduction to HAP	2	Atlanta, GA	LM, SL
12/10/2013	Transcat: Calibration Laboratory Audit Prep	1	Webinar	KG
1/14/2014	EPA: Aermod Modeling System Update	2	Webinar	AM, SL
1/28/1014	EPA: CDX & CEDRI Overview	5	Webinar	AM, JR, DC, BG, SL
1/31/2014	CARB 102	1	Online	LM
2/4/2014	EPA: State Review Workshop	1	Webinar	JR
2/5/2014	Federal Interagency Committee on IAQ	1	Webinar	BG
2/25-27/14	APTI 350: Asbestos NESHAP	2	Raleigh, NC	ES, LM
	EPA: National Air Quality Conference	1	Raleigh, NC	MG
3/20/2014	AQS: QA Transactions	1	Webinar	SH
3/25-27/2014	EPA R4: Air Monitoring Workshop	1	Athens, GA	JFr
3/25-27/2014	EPA: BACT to Basics - NSR	3	Webinar	ES, AM, BG
4/10/2014	PEs of NC: Triad Regional Seminar	1	Greensboro, NC	DC
4/16/2014	Indiana DEM: CROMERR Compliant Electronic Reporting	1	Webinar	RN
4/16-18/2014	CAPCA: Spring Meeting	1	Ashville, NC	LR
	QAI: ISO 14001 Lead Auditor Training	1	Myrtle Beach, SC	MG
4/28-29/2014	CISA: Carolina Climate Resilience Conference	1	Charlotte, NC	JF
4/29-30/2014	Smoke School	1	Hickory, NC	AD
5/8/2014	Vaisala: Calibration of Vaisala Met. Instruments	1	Webinar	KG
5/9/2014	Carolina CAT: Combined Heat and Power Seminar	2	Concord, NC	DC, BG

5/20-22/2014	EPA R4: Air Directors and Grant Workshop	2	Decatur, GA	JR, LR
5/22/2014	Fluke: Calibrating Temperature Sensors and Electronics	1	Webinar	KG
6/3/2014	NCDOT: Project Training Workshop	1	Charlotte, NC	JF
6/4/2014	ASHRA: The IAQ Procedure and LEED	1	Webinar	RN
6/18/2014	EPA: RICE Regulations	5	Webinar	ES, RN, DC, LM, BG
7/10/2014	EPA: IAQ Quarterly Conference Call	1	Conference Call	BG
8/10-14/2014	EPA: National Air Quality Conference	1	Atlanta, GA	JFr
9/9-11/2014	Southeastern States Asbestos Conference	1	Decatur, GA	JR
9/22-24/2014	SEDC: 9th Annual Partners Meeting	1	Atlanta, GA	JF
9/23-25/2014	TGB: Air Emissions from Above Ground Tanks	1	Webinar	AM
9/26-28/2014	DHEC: NSR Enforcement	1	Columbia, SC	CG
9/30/2014	Advanced Topics in Bioaerosols and Building Science	1	Webinar	BG
9/30/2014	AQ Monitoring Network Assessments	1	Webinar	SH