



STATE OF MISSISSIPPI

PHIL BRYANT

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

GARY C. RIKARD, EXECUTIVE DIRECTOR

December 15, 2014

Mr. Stuart Perry
Indoor Environments & Grants Section
Air, Pesticides and Toxics Management Division
U. S. Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Subject: Air Planning Agreement (APA) Performance Report for FY-2014

Dear Mr. Perry:

We have conducted a self-audit of activities performed under the FY-2014 APA. We are pleased to report successful completion of all grant commitments. We also offer the following additional information and comments for the activities performed during the year.

MDEQ has continued implementing the provisions of the accidental release prevention regulations to all affected facilities in Mississippi. As of October 1, 2014, there were 153 active facilities subject to the requirements. The MDEQ completed fifty (50) facility inspections at active facilities during the past year and five (5) of those were completed at facilities designated by EPA as being "High-Risk" entities. During the past year, three (3) facilities submitted a Risk Management Plan for the first time while seven (7) facilities submitted a de-registration notification to the Reporting Center since their regulated substance quantities had fallen below program applicability thresholds.

We have continued to work to identify and communicate the requirements of regulations to facilities affected by the major and area source MACT standards. Activities in this area have focused on outreach and assistance to entities that are potentially impacted by the major and area source boiler rules, the RICE rule, and the rule affecting operations at Coal- and Oil-Fired Electric Utility Steam Generating Units (i.e., MATS rule).

In December 2013, the MDEQ finished collecting ambient air samples for the air toxics monitoring study in Columbus, MS that began in January of 2013. Our review of the data determined that there were not any concentrations of any compounds at levels that would warrant additional or any corrective action(s). Our evaluation included an analysis of the measured concentrations against just 1% of the Threshold Limit Value (TLV) which is a value used to determine the acceptable work place exposure over a lifetime without having adverse health effects. This comparison has been used by MDEQ in previous permit determinations and was

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considered to be representative as to how we would use the data obtained during the study. In May 2014, the MDEQ met with the community to discuss our findings. EPA has completed a Risk Assessment for the community using the data obtained during the study and is releasing it to the public in December 2014.

Our asbestos program received 522 demolition/renovation project notifications. Each notice was reviewed and 147 project inspections were performed. There were also 31 complaints investigated. Also, MDEQ's asbestos certification program issued asbestos abatement certificates to 1384 individuals and we performed school building asbestos management plan inspections at 32 school locations across our State to review compliance with Asbestos Hazard Emergency Response Act regulations.

Mississippi also met all ambient air quality monitoring commitments for FY-2014. Our SLAMS network during the year included 8 ozone, 7 PM_{2.5} reference method, 4 PM_{2.5} continuous, 1 sulfur dioxide, and 1 nitrogen dioxide monitoring sites. Results are showing attainment of the NAAQS for all monitoring sites. However, the metropolitan part of De Soto County has been designated as nonattainment for ozone based on data from other ozone sites in the Memphis Metropolitan Area. In addition, the N-CORE site was operated with the full range of required instruments.

MDEQ used Diesel Emission Reduction (DERA) State Grant funds in 2013 to fund competitive sub-grant projects in which entities applied for funding by submitting an application following a request for proposals. Entities proposed diesel emission reduction strategies and were encouraged to provide matching funds for their projects. Eligible projects included engine repowers, engine upgrades, engine replacement, retrofitting of equipment, cleaner fuels, or idle reduction technologies. Eligible entities for this project included universities, private organizations, non-profit organizations, businesses, and any county, city, and other local governments. In 2013, MDEQ received 20 applications requesting over \$600,000 in funding. MDEQ awarded six grants for approximately \$160,000. In 2014, MDEQ used DERA funding to assist school district in replacing older diesel buses with newer, cleaner, and more efficient 2014 model buses. MDEQ helped in the replacement of ten buses in eight school districts in the state. Due to the success of this grant program, MDEQ expects to continue this program with a new DERA State Grant from EPA.

Emission reductions in Mississippi and adjoining states have resulted in a downward trend in ozone concentrations. However, the impact of the new ozone standard may result in the Mississippi Gulf Coast counties and De Soto County areas being designated non-attainment. MDEQ is continuing a voluntary ozone precursor air pollution control program in partnership with other governmental and business leaders in these areas.

Mississippi successfully submitted the 2012 emission inventory to the National Emission Inventory (NEI) for the required sources. This included HAPs at a point level as well as criteria pollutants. The inventory was due December 31, 2013. We are also working to submit the 2013 inventory which is due December 31, 2014. Emissions reports were submitted by the subject facilities and are currently being reviewed and entered into our emissions system for submittal. It appears that we will meet the submission deadline. The EIS reporting system is more resource

intensive than the former NEI system since it basically requires us to maintain a lot of exact replica data in our database and the EIS. Any help from EPA in reducing replicated data and workload in this area is appreciated.

Since part of DeSoto County was designated as non-attainment along with the rest of the Memphis Area, Emission Statement and Emissions Inventory SIPs were required to be submitted. MDEQ completed and submitted these SIPs for DeSoto County.

Finally, MDEQ issues daily air quality forecasts for the Mississippi Gulf Coast and the Jackson Metropolitan Area from April through October each year. Also, MDEQ, in association with the Memphis-Shelby County Health Department, issues air quality forecasts for De Soto County. These forecasts are made available through e-mail and MDEQ's web site.

If you should have questions or require additional information, please let us know. You may contact me by calling 601-961-5225.

Sincerely,

A handwritten signature in black ink, appearing to read "Danny S. Jackson". The signature is fluid and cursive, with the first name "Danny" and last name "Jackson" clearly distinguishable.

Danny S. Jackson
Chief, Air Toxics Branch