

FFY 2006 End-of-Year Progress Report

RAPCA–Dayton, Ohio

This report covers the time period October 1, 2005 to September 30, 2006, our federal fiscal year (FFY). The report is meant to show conformance with grant commitments for the FFY 2006. The format for this report is to cover basic program elements, report air quality data by pollutant, and to report quantifiable statistics.

RAPCA is one of nine local agencies within the state of Ohio and strives for accountability and the protection of public health and welfare in all its actions. The agency's adopted mission statement is as follows: "the primary mission of the Regional Air Pollution Control Agency is to protect the citizens of the Miami Valley from the adverse health and welfare impacts of air pollution. This is accomplished through the enforcement of federal, state, and local air pollution control regulations, and through implementation of the state's industrial permit system. RAPCA strives for technical credibility and accountability in all actions." Agency supervisors are mindful of the mission statement and emphasize its accomplishment.

The agency is organized into three units: 1) the Abatement Unit (responsible for permits, inspections, enforcement, and complaint investigation), 2) the Monitoring and Analysis Unit (responsible for monitoring, indoor air, modeling, mobile sources, emissions inventory, asbestos renovation/demolition, and toxics), and 3) the Administrative Unit (responsible for grants, training, public participation, and media contacts). Our most recent organizational chart is attached to this report; we are currently fully staffed at 36 full-time employees.

RAPCA's funding for FFY 2006 remained steady and allowed us to continue with our program operation. While we had a slight decrease in our federal award for FFY 2006, our funding from Ohio EPA increased somewhat due, in part, to implementation of a new source of air pollution control funding tied to solid waste disposal fees.

RAPCA receives local funding from a Human Services Levy in Montgomery County, Ohio. This levy went into effect in 2004 and will continue through 2008. RAPCA's local funding amount decreased in FFY 2006, and is projected to decrease in FFY2007 and FFY2008. This decrease in local funding is due to a shortfall of funding to the Human Services agencies as a whole. This requires the Combined Health District, of which we are a part, to examine expenses and make necessary reductions. Many expenditure reductions have already been put into place by following recommendations made by the Levy Council such as joining Montgomery County's health insurance plan, reducing the percentage of salary increase awarded to employees on anniversary dates, attrition, etc.

Other funding sources were sought and awarded in FFY2006 to RAPCA. We were again awarded funding from the Ohio Department of Health to continue with our Indoor Radon program. Our first year receiving this funding was in FFY2005 and we have also been awarded this funding in FFY 2007, although at a reduced funding level. RAPCA also received \$75,000 from Cargill, Inc. to initiate a woodstove changeout program in our six counties. RAPCA worked with U.S. EPA and several trade

organizations on this project. In addition, we received funding from the Miami Valley Regional Planning Commission (MVRPC) in FFY2006 to cover specific training and conferences to enhance our PM_{2.5} forecasting program. This funding was an increase over funding made available to our agency in FFY 2005, and we will receive additional funding in FFY2007 from MVRPC. More information on the above programs can be found later in this report.

In our outlook for FFY2007, we await news of the approved federal budget and the impact of reductions to the air pollution program. Right now, we are anticipating similar funding in FFY2007 to the FFY 2006 levels. Questionable items such as the Particulate Matter Section 105 monies being moved to Section 103 funds are a concern, especially with our anticipated local funding decreases through FFY2008. Our State funding for 2007 looks to increase over FFY2006 levels, including an increase in the Title V fees received. We do not anticipate a problem in meeting our Continuing Eligibility Level or local match funding in 2007.

Training of our staff is vital to RAPCA and effects the level of service we provide to the citizens of our six county region. RAPCA strives to provide necessary training for our staff, while tailoring the courses to fit the individual jobs within our agency, more specifically, the Abatement and the Monitoring and Analysis Units.

During this past fiscal year, RAPCA staff received training from a variety of sources. This year, RAPCA emphasized group training activities that would update staff on current air pollution rules and any changes in policies and procedures. We focused heavily on cross-training our staff in a variety of areas. This training was either completed in-house, by attending training offered by U.S. EPA or Ohio EPA, or from a separate training provider. The list below enumerates some of the courses completed by our staff:

- Stack Testing Training
- Ohio EPA Rule Changes
- PM NAAQS
- Mercury Controls
- Dry Cleaner Inspections
- Pollen & Mold
- Electrical Training
- CMS/Contract/CETA
- MACT Compliance
- Air Inspector's Workshop
- Bioterrorism
- RACT/BACT/LAER Clearinghouse
- GDF
- CARB 200

RAPCA continues to rely on U.S. EPA's Air Pollution Training Institute (APTI) courses. There are three core courses that all staff must complete within the first three months of employment, giving a general overview on air pollution controls and methodology. The course requirements that follow are outlined to match the employee's job responsibilities and knowledge. These required courses are scheduled for completion within a two year time frame from the employee's start date. Supervisors also assign various APTI courses for staff to complete annually. 2006 APTI statistics: RAPCA staff completed 5 self instructional (SI) courses.

RAPCA also searches for training opportunities offered from Lake Michigan Air Directors Consortium (LADCO), as well as courses offered at nearby universities. Staff are occasionally sent to courses hosted by the Environmental Training Institute at the University of Cincinnati, and the training opportunities offered by other U.S. EPA regions.


RAPCA also sends several staff members to the annual Air and Waste Management Association (AMWA) conference and we share information from the semi-annual National Association of Clean Air Agencies (NACAA, formerly STAPPA/ALAPCO) meetings.

Members of our Inspection and Enforcement staff are also required to certify every six months on visible emissions, also known as smoke school. All staff have current certification.

RAPCA is directly involved with the NACAA Joint Training Committee's effort to develop and implement the National Training Strategy for air quality officials in 2006 and beyond. We participate in conference calls and have made suggestions for the direction of this program. RAPCA also has an active role in training planning with both LADCO and the Ohio Local Air Pollution Control Officials Association (OLAPCOA).

We view the top training needs for 2007 to be stack tester training; GDF training; workshops to inform staff on rule changes/modifications; and more advanced technical training for staff.

Casie Lord of RAPCA is our current training officer.



RAPCA strives to provide the general public with educational information on all aspects of air pollution and its control. Information on the technical aspects of controlling air pollution and its public health implications are disseminated to the general public through news releases, speaking engagements, literature distribution, a 24-hour air pollution line, and a monthly newsletter. Public concern and demand in this area are evidenced by the large number of requests for assistance.

Our public awareness program continues to be active. During FFY2006, we gave 74 public talks, issued 24 press releases, and had 287 media contacts. We provide the daily Air Quality Index (AQI) and a daily report on pollen and mold through a public phone service, called AirLine, to area residents. RAPCA personnel spoke to several thousand area citizens during 2006 on air pollution and its effects. The audiences ranged from school children to civic organizations and community leaders.

RAPCA participated in several local outreach efforts with other organizations to promote radon awareness. We collaborated with the Greene County Combined Health District and local realtor boards to present two Radon and Real Estate Seminars, which presented the latest information on risk reduction regarding radon and real estate transactions. RAPCA also worked with the Greene County Combined Health District to provide a free Radon Resistant Construction informational session at the Dayton Homebuilder's Association Annual Meeting; attendees learned the benefits of including radon resistant features in their new home construction plans. In addition, students at four local high schools participated in Radon Action Month by testing their homes for radon gas and sharing important radon information with their families.

RAPCA also participated in a local outreach effort with U.S. EPA, the Hearth, Patio, and Barbeque Association (HPBA), Cargill, and the Chimney Safety Institute of America to promote a woodstove changeout program. RAPCA received \$75,000 from Cargill to fund the Greater Dayton Woodstove Changeout Program which provided monetary incentives for homeowners to changeout their old, dirty, inefficient woodstoves with new, clean burning wood, pellet, corn or gas stoves. RAPCA issued "Clean Air Coupons" for \$300 toward the purchase of wood, pellet and corn stoves and \$400 towards the purchase of a gas stove. As of October 2006, RAPCA estimates that 85 to 90 stoves will be changed out as a result of the program. In early 2007, RAPCA is planning a low income changeout program and another Clean Air Coupon campaign.

We publish a monthly report and an annual report. We continually update our RAPCA home page on the worldwide web at www.rapca.org. The RAPCA home page provides publications, air quality data, the AQI and pollen and mold readings, the annual report, press releases, special reports on RAPCA program activities, and links to other air pollution related sites.

This past year RAPCA's Monitoring and Analysis Unit personnel provided technical assistance for the Southwest Ohio Heat Watch/Warning System. Using the synoptic climatological model and forecasts from the National Weather Service, RAPCA personnel made recommendations to the Health Commissioners from Dayton and Cincinnati on when to launch actions to provide public information as well as mitigation measures aimed at reducing morbidity and mortality. No alerts were issued in 2006, as compared to two for 2005.

In the past, the Regional Air Pollution Control Agency, in conjunction with the Miami Valley Regional Planning Commission (MVRPC), has issued "Ozone Action Day" notices when concentrations of ground-level ozone were expected to rise. Beginning April 1, 2004, the program was expanded to a year-round program and now includes notices regarding "particle pollution" or PM_{2.5}. As a result, we now issue "Air Pollution Advisory" notices (instead of "Ozone Action Day" notices) and indicate which pollutant(s) levels are predicted to be elevated.

The Dayton air pollution advisory forecasting program is carried out by a four person team of RAPCA's Monitoring and Analysis group. Using the synoptic climatological modeling results from the University of Delaware's Center for Climatic Research, weather forecasts from the National Weather Service's Wilmington Field Office, and current ozone and PM_{2.5} information, RAPCA personnel conduct technical assessments and offer both ozone and PM_{2.5} forecasts. These forecasts then trigger the Air Pollution Advisory Day events when the Air Quality Index (AQI) is predicted to rise above 100.

In 2006, RAPCA continued the entry of ozone and PM_{2.5} air quality forecasting data to the U.S. EPA's AirNow program, which provides valuable information to the public via the internet. Thus, the agency's air quality forecasts can be found on both the RAPCA web page and the U.S. EPA online service. In

2005, RAPCA began participating in the U.S. EPA EnviroFlash Program which is an automated email system that will issue e-mails anytime pollution levels rise. The service is free and anyone can sign up at <https://enviroflash.epa.gov/airnow/subscriber/start.do>.

There were 14 air pollution advisory notices issued in FFY2006. All but two of the notices contained an advisory for PM_{2.5} and on three occasions we issued a notice for both PM_{2.5} and ozone. On two days, we issued notices for only ozone. The area experienced four exceedances of the eight hour ozone standard and seven exceedances of the PM_{2.5} air quality index action level of 100. (Note: All PM_{2.5} exceedances of the AQI action level of 100 were measured with continuous PM_{2.5} monitors. These data are unofficial and are not used to determine attainment of the PM_{2.5} standard). Considering the warmer temperatures in 2006, overall ozone and PM_{2.5} levels were lower than years of similar temperatures. After two full years of PM_{2.5} forecasting, we have developed more accurate methods and expect better forecasting results in the future. We will be receiving funding from the Miami Valley Regional Planning Commission (MVRPC) in 2007 to enhance our forecasting capabilities.

Ozone concentrations are monitored in the Miami Valley at six sites. This region is designated as attainment for the one-hour ozone standard and is operating under an approved maintenance plan. We were designated nonattainment in four of our six counties for the eight-hour ozone standard in June of 2004. Based upon good air quality over the last four years, OEPA is in the process of submitting a request to USEPA to redesignate the area to attainment for eight-hour ozone. We should know by mid 2007 if this request has been approved.

Fine particulate matter is monitored at five sites. U.S. EPA finalized a nonattainment designation in three of our six counties for the PM_{2.5} standard in April of 2005. Unlike ground-level ozone, particle pollution does not need sunlight to form and can reach unhealthy levels any time during the year. Colder temperatures result in more wood burning which increases particle pollution. Particle pollution is so fine that it can remain suspended in the air for long periods of time. Therefore, an Air Pollution Advisory may be issued at any time during the year. In September 2006, U.S. EPA issued a more stringent 24-hour PM_{2.5} standard, lowering the current standard from 65ug/m³ to 35ug/m³, while leaving the annual standard unchanged. RAPCA will begin analyzing PM_{2.5} data to determine if this change will affect our current attainment status for the 24-hour average. State recommendations are due by November 2007, and U.S. EPA will make final designations in 2009.

Both ground-level ozone and particulate pollution can be harmful to your health. People who play or work outdoors are the most at risk. Both pollutants are particularly harmful to children, the elderly, and people with heart or respiratory problems. People with breathing problems such as asthma or allergies, should stay indoors when air pollution concentrations are high. It's important that everyone takes action to reduce air pollution year-round and especially on days when an Air Pollution Advisory has been issued.

RAPCA personnel regularly attend the meetings of our local metropolitan transportation coordination organization, the Miami Valley Regional Planning Commission (MVRPC). Historically, we have closely followed the state inspection/maintenance program in three of our counties. Unfortunately, the

State of Ohio decided to discontinue the Ohio E-Check program in Southwest Ohio and on January 1, 2006, the program was canceled. During FFY 2006, RAPCA personnel conducted four anti-tampering inspections in Montgomery County. However, due to the loss of the Ohio E-Check program, RAPCA personnel will dedicate more time to anti-tampering inspections in the future.

RAPCA's indoor air quality program received 1250 indoor air-related phone calls during FFY 2006. Agency representatives conducted 116 inspections of indoor air concerns and distributed over 500 indoor air quality information packets that included EPA literature on mold, radon, asthma triggers, and other indoor air pollutants. Packets were distributed via mail, on-site inspections, and participation in local health and environmental festivals.

RAPCA's radon awareness program received 655 phone calls and distributed over 2,000 home test kits during FFY 2006. Local municipalities and health departments serving as radon kit distribution sites were instrumental in this successful outreach effort.

During FFY 2006, 311 Demo/Reno notifications were received with 162 inspections of these sites. Additionally, RAPCA has a more stringent local rule, which generated 11 local notifications and 3 inspection regarding asbestos. As usual we also received a large number (1005) of public inquiries regarding asbestos and 26 complaints. We conducted 29 inspections in direct response to the complaints. Over the year, we issued 9 notices of violation, 7 of which were settled with local findings and orders. One enforcement action request was filed with Ohio EPA.

This past year RAPCA had available the services of a legal consultant/attorney who provided legal advice to personnel on a variety of topical issues affecting the agency. He regularly participated in internal enforcement conferences, meetings with violators and their legal counsel, and monthly enforcement status meetings with U.S.EPA and Ohio EPA. Related enforcement and settlement documents were drafted, and/or reviewed and commented upon. Significant air pollution related court cases and legislation were tracked, analyzed and communicated to agency personnel. Proposed changes to RAPCA's contract with Ohio EPA were drafted and submitted. Agency files were reviewed for confidential or privileged material prior to their release for public viewing and copying. In the coming year, RAPCA will continue to receive these legal services on an as needed basis.

During FFY2006, we received 89 new applications for Permits to Install (PTI), processed 69 applications for new installations, and 26 applications for modifications. At the start of FFY2007, we had 14 PTI applications in house pending review. We also received 177 Permit to Operate (PTO) applications for non-Title V sources (including Federally Enforceable State Operating Permits) and we processed 177. We have 283 state-only PTO applications in house pending review.

RAPCA currently has 43 Title V facilities in our six county jurisdiction. This number is always changing with new facility installations and old facility shutdowns. We are in the process of renewing the first round of Title V permits that have expired. For the years 2002-2006, there have been a total of 29 Title V permits expire. To date, we have renewed 11 Title V operating permits and issued 1 synthetic minor PTI to avoid the Title V operating permit requirements. At this point, we have 14 Title V renewal applications in various stages of review and issuance. During 2006, there were 2 Title V facilities that shutdown and 1 new Title V facility issued a PTI.

During the renewal process of the Title V permits, the Compliance Assurance Monitoring (CAM) requirements and newly promulgated Maximum Achievable Control Technology (MACT) standards are being reviewed for applicability. At this time, we are aware of 3 Title V permits that will need to be 'reopened for cause' to incorporate new applicable rules. The goal is to incorporate the newly promulgated rules into the Title V permit, prior to the first compliance date of the rule, to allow it to be enforceable by the state.

Additionally, RAPCA has approximately 75 facilities who have accepted federally enforceable synthetic minor restrictions in a permit to avoid the Title V permitting requirements. This is up 2 from last year, due to those Title V facilities opting to go synthetic minor when the Title V permit expired versus renewing it.

RAPCA received a PTI application on July 7, 2006 from the Andersons Inc. facility to install a 127 million gallon/year ethanol fuel production plant to be located in Greenville, Ohio in Darke County. We were the first local air agency in Ohio to receive a PTI application for an ethanol fuel production plant. The draft PTI was issued on September 21, 2006 and RAPCA and Ohio EPA jointly held a public hearing on October 26, 2006. RAPCA prepared a responsiveness summary to the comments received during the public comment period and made a final action recommendation on November 8, 2006. The final PTI was issued to the Andersons Inc. on November 14, 2006.

Our facility inspection group met all the agreed-upon U.S. EPA grant commitments in FFY 2006 by completing the following inspections:

Facility Type	Number of Inspections
Title V	40
Synthetic Minor	56
NESHAP	19
NSPS	1
GDF	404
Other	105

In accordance with the Federal Compliance Monitoring Strategy (CMS), RAPCA submitted a two-year inspection plan for fiscal years 2006 and 2007 to the Ohio EPA and the U.S. EPA. Compliance evaluations completed during fiscal year 2006 exceeded the recommended CMS frequencies for compliance evaluation completions for Title V and synthetic minor facilities. A full compliance evaluation was conducted at over 90 percent of the Title V facilities and over 76 percent of the synthetic minor/FESOP facilities. In addition, many compliance evaluations were conducted to assess compliance with the MACT and NSPS requirements at affected facilities. The "other" facilities include compliance evaluations conducted on minor facilities to evaluate facility compliance information and to obtain information to properly renew the State Permits to Operate.

During fiscal year 2006, RAPCA observed a total of 58 stack tests. Stack tests are conducted to measure the amount of regulated pollutants emitted, to demonstrate the capture efficiency of control equipment, and to determine the destruction or removal efficiency of a control devices used to reduce emissions at facilities subject to the requirements of the Clean Air Act. RAPCA considers stack testing an important tool to determine a facility's compliance status.

Ohio utilizes the Compliance and Enforcement Tracking Application (CETA) program to upload all inspection data required by the Federal CMS into AFS. The information uploaded to AFS includes enforcement activity, Appendix K data, and the completion of compliance evaluations for Title V, FESOP/SM facilities. Ohio has organized a work group to revise the CETA program to improve the program's effectiveness, make program improvements, and compile a users' manual. The modifications to the program have been completed and state wide training has been conducted. RAPCA has actively participated in this group.



RAPCA personnel investigated 8 Title V facility complaints, 29 non-Title V facility complaints, 159 open burning complaints, and 82 "other" complaints. Additionally, 465 open burning applications were processed, and 685 field surveillance actions were conducted, we performed 152 formal visible emission

evaluations, and reviewed for compliance 6,396 reports. Also, a total of 404 gasoline dispensing facilities were inspected during the witnessing of pressure decay and air to liquid ratio testing in FFY 2006.

During FFY 2006, 126 warning letters were sent, 79 field orders were written and issued, 7 official Notices of Violation (NOV) were issued, and 4 administrative orders were executed. A listing of all outstanding NOV's is shared with Region 5 personnel and the status of each case is discussed on a monthly basis. Beginning in the third quarter of FFY 2003, and continuing into FFY 2006, RAPCA has been involved in a major enforcement action involving a local facility with significant noncompliant emissions of volatile organic compounds (VOC). The action was initiated by the U.S. EPA, and is "global" in scope in that the facility in noncompliance has other non-complying facilities in other states. In that the violations are similar from plant to plant, RAPCA has worked cooperatively with the U.S. EPA, other states, and other local agencies. With EPA's concurrence, a Notice of Violation has been issued by RAPCA to notify the company of the specific nature and extent of the violations. A Consent Decree has been signed by the company, as well as by U.S. EPA, U.S. Department of Justice and various state and local government agencies. The Consent Decree was signed by the Judge on February 27, 2006, and the case was filed on March 3, 2006. The milestones in the Consent Decree are numerous and extend into 2012. Thus far, the company has met the local milestones (Title V fees, civil penalty, and donated to local wood stove program) on time. With the addition of thermal oxidizer control and the optimization of scrubber controls one major result will be to control VOC emissions to a "LAER like" level for several units that were previously uncontrolled.

In 2002, RAPCA was awarded grants for two air toxics projects. The first titled, "Ambient Volatile Organic Compound Sampling at Modeled Point Source Hotspots in Montgomery County," and the second titled "Air Toxics Assessment Refinement in RAPCA's Jurisdiction," were completed satisfactorily. RAPCA received a letter dated October 25, 2006, from Stephen Rothblatt, Director, Air and Radiation Division, Region 5, thanking RAPCA for improving their "efforts to ensure the best possible air quality for citizens in RAPCA's service area." Reports on both projects are posted on RAPCA's web site at http://www.rapca.org/publications/documents/airtoxicsassessment_103105.pdf.

RAPCA staff also spent considerable time during 2006 reviewing recently implemented legislation, Senate Bill 265, dealing primarily with the control of air toxics in Ohio. This bill was intended by its authors to streamline the permitting process by requiring the Ohio EPA to adopt uniform rules, no more stringent than federal legislation. RAPCA was vehemently opposed to the legislation, as it does away with the case-by-case BAT determinations RAPCA currently conducts for new sources. The legislation eliminates BAT for new sources less than 10 TPY, after controls, and requires that Ohio EPA promulgate BAT rules for sources greater than 10 TPY within three years. For any source not covered in a BAT category, RACT is the applicable rule.

RAPCA personnel are fully participating in the development of the 2002 NEI. An initial point source data submittal to U.S. EPA was made in May 2004, and builds on the enhanced 1999 inventory developed as part of the air toxics grant described above. Subsequent to the initial submittal, four correction submittals were made. The draft 2002 NEI was released in February 2005, and the final 2002 NEI was released in February 2006. This emission inventory information is essential for SIP development purposes.

Title V facility fee emission reports were submitted by affected facilities in Spring 2006, for calendar year 2005. Using these data, RAPCA personnel compiled a point source emission inventory for five criteria pollutants (PM-10, SO₂, NO_x, CO, and OC). This represents the eleventh consecutive year Title V facility emissions have been inventoried in RAPCA's jurisdiction. A summary table for Title V point source emissions inventory in RAPCA jurisdiction is shown below:

Year	PM, Tons	SO ₂ , Tons	NO _x , Tons	CO, Tons	OC, Tons	# of Facilities
1995	2,914	10,639	8,697	-	3,562	60
1996	2,354	10,672	8,336	-	3,007	52
1997	1,948	11,907	9,868	-	2,648	49
1998	1,879	8,858	8,369	-	2,236	49
1999	1,909	8,074	7,650	1,957	2,027	47
2000	1,915	10,583	9,196	1,857	1,672	47
2001	1,752	10,288	8,637	1,628	1,526	47
2002	1,822	9,690	8,055	1,588	1,613	48
2003	1,817	11,546	9,486	1,314	1,978	46
2004	804	7,591	4,789	1,270	1,841	45
2005	964	9,074	6,976	1,195	1,941	42

Reductions in PM, SO₂ and NO_x are evident. These are attributable to reduced operations at DP&L Hutchings in 2004 and the installation of a low- NO_x burner at CEMEX.

The RAPCA HAP emission inventory is based on TRI data released by the Ohio EPA. The most recent TRI report is for toxic releases in calendar year 2004. RAPCA personnel have extracted the HAPs data for facilities in RAPCA's jurisdiction. The 13 most recent years of TRI data are summarized in the table below:

Year	HAP Air Emissions, Tons	# of HAPs	# of Facilities
1992	2,231	42	99
1993	2,120	40	96
1994	1,520	42	98
1995	1,355	43	86
1996	1,366	44	85
1997	1,160	36	81
1998	1,400	41	94
1999	1,150	36	99
2000	1,172	35	80
2001	905	25	93
2002	875	40	75
2003	903	38	71
2004	682	36	65

There are a number of mechanisms that the agency uses to share its visions and specific concerns at both the state and national level. One such mechanism is by virtue of serving on technical committees, at both the state and the national levels. RAPCA staff participated routinely in the committees detailed below in 2006.

State Committees

The permitting and enforcement committee addresses day-to-day problems associated with implementing and enforcing the Ohio air pollution control rules. A standing committee implements the procedures for Ohio EPA to issue a combined Permit to Install and Permit to Operate. Another committee focuses on issues related to the reporting of activities to state and national data bases. RAPCA also participates in both state and national monitoring committees.

In addition, there are state level ad hoc committees charged with assisting in developing technical rules, policy and guidance. Some of the more noteworthy projects in FFY 2006 involved the Compliance and Enforcement Tracking Application (CETA) system, enforcement improvement, state and local training, permits-by-rule, and general permits for various industrial categories. RAPCA actively participated in these committees, many of which were coordinated thru the Ohio Local Air Pollution Control Officials Association (OLAPCOA).

National Committees

In addition to the state-level committees, RAPCA remains active in NACAA (formerly STAPPA/ALAPCO) and OLAPCOA with several staff assigned to the various committees of these two groups. This includes the chairmanship of the new source review and energy committees. Additionally, John Paul, RAPCA Supervisor, served as the president of ALAPCO in FFY 2006, and is the legislative

liaison for OLAPCOA. Other staff also participate in NACAA committees such training, permitting, monitoring, and mobile sources.

Ozone concentrations are monitored continuously throughout the April-October ozone season at six sites in the Miami Valley. The technique used is ultra-violet (or UV) photometry, and is based on the fact that ozone absorbs ultra-violet light. In the UV method, an air sample is diverted into a catalytic converter which changes any ozone present into oxygen. This sample is then passed through the absorption chamber to determine the amount of UV light passed through it, which serves as a clean-air reference. An unaltered sample is then introduced into the absorption chamber and the reduced amount of UV light passed through it is also measured. The difference between the two values represents the amount of ozone that was present.

We are designated attainment for the one-hour ozone standard and are operating under our approved maintenance plan. However in 2004, four of our six counties were designated non-attainment for the eight-hour ozone NAAQS, and later, Clark, Greene, and Montgomery were designated non-attainment for the PM_{2.5} NAAQS.

Note: 615 is our background site; 616 is our downwind site; 619 is located in Miami County, north of Dayton; Site 40 was our urban location but was replaced by Site 47 in March 2004; 6X is located in Greene County, and Site 611 is on the border of Clark and Greene Counties. Monitored ozone data for the past few years are as follows:

Calendar Year 2006 Ozone Statistics
Apr - Oct 2006
1-hr and 8-hr Ozone Statistics
NAAQS = 0.08 ppm 8-hr, 0.12 ppm 1-hr

Source: AIRS, AMP450

RAPCA Site#	Peak 1-hr	# 1-hr Exceedances >125 ppb	Peak 8-hr	4th Max 8-hr	# 8-hr Exceedances >85 ppb
611	101	0	87	74	1
615	89	0	78	72	0
616	104	0	91	76	1
619	103	0	88	73	1
47	97	0	84	71	0
6X	106	0	85	79	1

**8-Hr Ozone Violation Calculation
3-yr Avg. of the 4th Highs for 2004-2006, ppb**

(85 ppb or higher is an exceedance)

Site 47	73	Montgomery
Site 6X	79	Greene
Site 611	76	Clark
Site 615	73	Preble
Site 616	80	Clark
Site 619	76	Miami

**One-Hr Ozone Violation Calculation, 2004-2006 data
Avg. # Actual Exceedances in 3 yr**

Site 47	0.0
Site 6X	0.0
Site 611	0.0
Site 615	0.0
Site 616	0.0
Site 619	0.0

Analysis of Ozone Data, 2006

It appears we can safely make the following statements with regard to ozone in the RAPCA area.

- The area continues to meet the old one-hour standard.
- 2006 was an average year for ozone with no exceedances of the one-hour standard, and only 4 site-days with an eight-hour reading of 85 ppb or greater, spread among the six sites.
- The area meets the eight-hour standard at all of our six sites.

With fairly stringent VOC control measures in place in the RAPCA area, despite the discontinuation of the inspection/maintenance program, it appears that attainment & maintenance of the eight-hour standard is going to be highly dependent upon regional/national measures for control of NO_x emissions. It may be that implementation of the NO_x SIP call and Tier-2 vehicle standards with low sulfur gasoline may be sufficient to provide for attainment. We believe that U.S. EPA modeling shows this to be the case. If not, then further reductions through national measures such as multi-pollutant legislation for utilities and heavy duty diesel controls for both on-road and off-road engines will be necessary

PM₁₀

We operate two PM₁₀ monitoring sites on a once-every-six-day cycle. Site 8 contains a co-located sampler. The trends in the annual averages are insignificant but downward at both sites, all of which read below the standard. Years 2005 and 2006 data to date are as follows:

PM₁₀ Data, 24-Hr Averages, ug/m3
NAAQS = 50, annual mean
NAAQS = 150 24-hr avg., (99th %tile, same as Max)

Year 2005	Annual Mean*	Max	Year 2005 (Quarters 1-3)	Mean (3Q weighted)	Max
Site 8	28.3	71	Site 8	23.3	45
Site 620	19.5	52	Site 620	17.4	33

**Annual weighted means*

PM_{2.5}

We also operate six FRM PM_{2.5} samplers at five sites (two are co-located at Site 46), a speciation site, and five continuous PM_{2.5} monitors alongside the FRM monitors. Continuous Site 615 was added in October, 2003, and FRM Site 620 was added in February 2004. In late 2005, we added continuous PM_{2.5} monitors at Sites 620 and 621, and we changed all of the C-14 type continuous PM_{2.5} monitors to the Thermo Electron Corporation SHARP type, except for the one at Site 615. We hope the change will increase the agreement between the continuous and FRM-type monitors. We also switched all the continuous monitoring sites (including PM_{2.5}, ozone, and CO sites) from dial-up to wireless modems with Internet access. The speed of data retrieval has been greatly improved with this change. On days forecasted to have high PM_{2.5}, we make sure to run an FRM filter at the library site (46) to compare to the continuous site readings.

The continuous PM_{2.5} sites are regarded as experimental (notice that the continuous monitors have higher averages than their co-located FRM monitors.) We do not rely on their data for determining Attainment of the NAAQS. The data for both monitor types are presented below:

PM_{2.5} Data, ug/m³
Weighted 4-Q Annual Average, max value
Annual Avg. NAAQS = 15 ug/m³
24-hr NAAQS = 65 ug/m³**

Source: AIRS, AMP 450/NC & local files

Year 2005	Weighted Annual Average	Max Daily Value	Year 2006 (To Date)	Weighted Annual Average	Max Daily Value
45-FRM	16.75	44.3	45-FRM	13.78*	30.7
45-Cont.	18.07	55.3	45-Cont.	15.51	46.0
45-Spec.	18.04*	47.0	45-Spec.	15.53*	45.8
46-FRM	17.36	49.1	46-FRM	14.20*	35.5
46-Cont.	19.46	63.3	46-Cont.	15.93	47.6
615-FRM	15.63	50.0	615-FRM	13.09*	29.5
615-Cont.	14.47	53.9	615-Cont.	12.41	35
620-FRM	15.46	40.7	620-FRM	12.70*	31.5
620-Cont.	13.36*	30.7	620-Cont.	14.65	45.3
621-FRM	16.66	45.0	621-FRM	13.79*	34.9
621-Cont.	14.13*	29.8	621-Cont.	15.03	44.0

* does not satisfy summary criteria

**the AQI cutpoint of 100 is set to 40 ug/m³

A three-year average of these FRM annual averages is used to determine attainment of the annual NAAQS of 15 ug/m³. Only the five standard FRM monitors are listed in the table below. This is the 2003-2005 average, with incomplete annual averages omitted.

FRM Sites	3-yr-avg
45	15.3
46	15.9
615	14.1
620	n/a only 1 complete yr.
621	14.7

(With incomplete annual averages included, those same 3-yr averages would be: 15.0, 15.9, 13.9, 13.8, 14.7, respectively. 15.1 ug/m³ and above indicate an exceedance of the NAAQS.)

**PM_{2.5} Data, ug/m3, 98th Percentile Values
24-Hr. NAAQS = 65 ug/m3**

Monitoring Site	Year 2005	Year 2006 (To Date) *All N/A, see Max Values Above
45-FRM	42.9	N/A
45-Cont.	45.1	N/A
45-Spec.	47.0	N/A
46-FRM	45.0	N/A
46-Cont.	48.1	N/A
615-FRM	39.0	N/A
615-Cont.	39.8	N/A
620-FRM	40.0	N/A
620-Cont.	24.7*	N/A
621-FRM	41.6	N/A
621-Cont.	28.1*	N/A

**incomplete year*

A three-year average of these FRM percentiles is used to determine attainment of the 24-hour NAAQS of 65 ug/m3. These are the 2003 through 2005 averages, with incomplete years omitted:

45-FRM	37.1 ug/m3
46-FRM	40.1
615-FRM	33.7
620-FRM	N/A
621-FRM	35.0

(620-FRM had 1 good year, 2005 = 40 ug/m3)

Analysis of PM Data

At the end of 2005, it appears we remain in attainment for PM₁₀ at all sites. Our data indicate attainment of the 24-hour PM_{2.5} standard (65 ug/m3). However, the data also indicate that we still exceed the PM_{2.5} annual average ambient standard of 15 ug/m3 at Sites 45 and 46.

It is important to note, once again, that the continuous monitors read higher than the FRM monitors. We do not use the continuous monitors for attainment purposes at this time, although we continue to report such data on our web site, and to use them in computing the current Air Quality Index.

National composition data indicate that sulfates, nitrates, ammonium, organic carbon, elemental carbon, and trace metals account for nearly all the PM_{2.5} mass. For the RAPCA area, the latest composition data from Site 45 indicate that our urban mass is dominated by four major species: sulfate (30%), organic carbon (25%), nitrate (16%), and ammonium (13%). No rural PM_{2.5} speciation monitor is present in RAPCA's area for comparison to national trends or Site 45 data.

With regard to the anticipated control strategies, it is likely we will once again depend upon national measures for control of utility emissions (SO₂ and NO_x) and national measures for control of diesel particulate (heavy duty diesel rules for on-road and off-road engines). We will be implementing several local measures to control PM emissions. These local measures will include encouraging the retrofit of trucks and buses with diesel oxidation catalysts and participating in a local initiative to replace older wood stoves with newer, more efficient, less polluting wood stoves.

Sulfur Dioxide

SO₂ is monitored only at Site 611, downwind of Dayton.

**Annual Average of Hourly Values
(NAAQS = 30 ppb, Annual Average)**

Site	2005 (ppb)	2006 (ppb, first 3 quarters)
Site 611	3.9	2.4

**SO₂ Data, 5 Highest 1-Hour Readings (1 per day), ppb
(NAAQS = 140 ppb, 24-hr Average)**

2005	2006 (3 Quarters)
Site 611: 77, 51, 51, 50, 50	Site 611: 42, 33, 32, 30, 29

Three-Hour NAAQS, 500 ppb. From the highest values listed above, it is impossible to come close to 500 on a three-hour average.

Analysis of SO₂ Data

Clearly, the SO₂ levels measured are significantly below the ambient standard for this pollutant. We envision the day that monitoring for this pollutant will no longer be of value, although it may help with understanding PM_{2.5} formation locally.

Lead

We no longer monitor for lead in the RAPCA area. The highest quarterly average for 1997 at our one site was 0.04 ug/m3, far below the standard (quarterly NAAQS = 1.5 ug/m3). This level was even lower in the first and second quarters of 1998, with 0.01 ug/m3 being the average for each quarter.

We have some sources (boilers and asphalt plants) that burn recycled oil. These sources are inspected, with waste oil samples taken and analyzed for lead and other contaminants on a periodic basis. The waste oil sampling is unannounced and is performed by a private contractor accompanied by a RAPCA inspector.

Carbon Monoxide (CO)

We operate two monitoring sites for CO and continue to measure attainment at each. Measurements have been low for many years. Data are as follows:

**Carbon Monoxide (CO)
5 highest (1 per day), ppm**

1-Hr Averages

NAAQS = 35 ppm, 1-hr

Year 2005

Site 10: 2.1, 2.0, 1.9, 1.8, 1.6

Site 48: 2.9, 2.8, 2.3, 2.3, 2.3

Year 2006 (first 3 quarters)

Site 10: 4.2, 1.8, 1.5, 1.4, 1.3

Site 48: 4.0, 2.6, 2.5, 2.0, 1.7

8-Hr Averages

NAAQS = 9 ppm, 8-hr

Year 2005

Site 10: 1.5, 1.4, 1.2, 1.1, 1.1

Site 48: 1.8, 1.7, 1.7, 1.6, 1.6

Year 2006 (first 3 quarters)

Site 10: 2.6, 1.0, 1.0, 0.90, 0.90

Site 48: 1.4, 1.3, 1.3, 1.3, 1.1

We do have stationary sources in our area with CO limits. Primary concern with each is to avoid local hot spots. Compliance with permitted limits is confirmed during facility inspections (parametric monitoring) and by source stack tests. The main source of CO is the vehicle population.

The State of Ohio is required by the federal Clean Air Act to implement a plan (State Implementation Plan or SIP) to keep the air clean. The Dayton-Springfield area is currently classified as nonattainment for the 8-hr ozone standard and the fine particulate standard. We have measured good ozone air quality over the last several years and we are working with the Ohio EPA and local interests to reclassify the area to attainment. This process should be concluding in mid-2007.

RAPCA began working in 2006 on a new PM_{2.5} SIP. RAPCA is working with area interests to identify local areas of emission reduction that can be incorporated in the plan. These interests include the Miami Valley Regional Planning Commission, the Clark County-Springfield Transportation Coordinating Committee, area industry, and environmental groups. We hope to identify and implement appropriate

control measures, some of which may be innovative or possibly more stringent than measures adopted at the national level. We have to have a recommendation to Ohio EPA and Region 5 in the summer of 2007.

Throughout 2006, in conjunction with both Ohio EPA and U.S. EPA, we have continued to operate an ambient monitoring network which emphasizes enhanced fine particulate continuous sampling and toxic sampling. During the past year the following significant issues occurred relative to our monitoring responsibilities:

- The entire network was integrated into a new digital telemetry system. This has enabled more efficient data retrieval. There were relatively few problems in polling data in this transition, though some sites (611 & 615) could use improved radio signals. We will make the necessary upgrades over the next several months.
- We installed continuous Thermo SHARP PM_{2.5} monitors in Springfield (Site 621) and in Yellow Springs (Site 620) in November, 2005.
- We replaced Anderson Continuous PM_{2.5} monitors with Thermo SHARPS at the downtown Dayton library site (Site 45) and at the east Dayton William Wright site (Site 46) in November, 2005. See comment below about continuous/FRM correlation.
- The ozone monitor at Site 619 in Miami County was relocated from inside the school to the bus barn about 20 yards from the original.

We have had better correlation between the FRM units and SHARPS monitors than we experienced in 2005 between the old Anderson continuous PM_{2.5} units and the FRM's. Previously there did not appear to be a strong correlation between the continuous results and collocated FRM units. The Anderson continuous PM_{2.5} monitoring units were replaced with Thermo SHARP monitors (with the exception of Site 615 in Preble County, which has retained the Anderson unit) to attempt and correct the discrepancy.

The SHARPS data look good on the whole with fewer errors. The 2006 monitoring season did provide us with data that indicated a stronger correlation. The SHARPS units also have improved operation and maintenance and are easier to troubleshoot.

As indicated above, in late 2005 we also converted most of our continuous monitoring sites from dial-up to wireless with the assistance of the Ohio EPA. This has led to rapid Internet access to all their current data. The two new PM_{2.5} continuous sites at Yellow Springs and Springfield will be included in this WiFi network.

EPA, Ten States and Four Counties Settle Cargill Ethanol Production Litigation

EPA announced in October 2005, a multi-state settlement with Cargill, Inc., an agribusiness whose corn processing plants are significant sources of volatile organic compounds (VOCs) and carbon monoxide (CO). EPA initiated enforcement action in federal district court in Minnesota, alleging that Cargill had seriously underestimated emissions from its operations in 13 states. The action first targeted two oilseed plants owned by Cargill in 2002 and, in 2003, added the company's nine corn mill plants. Reductions totaling approximately 30,000 tons of annual emissions are required under the settlement. Cargill's corn producing plants must install or improve thermal oxidizers and scrubbers in order to reduce VOC emissions by 10,450 tons per year and CO emissions will drop by 10,900 tons per year. Significant reductions of NO_x, SO₂, particulates and hazardous air pollutants are also required. In addition, the company will pay a civil penalty of \$1.6 million and spend \$3.5 million on supplemental environmental projects. According to EPA, 81 percent of uncontrolled ethanol production capacity is now under settlement agreements. Ten states and four counties joined the federal government in the Cargill settlement, including RAPCA and the local Miami Valley corn milling facility.

Mercury Model Rule Released

NACAA released in November, 2005, a model rule entitled, Regulating Mercury from Power Plants: A Model Rule for States and Localities, in response to concern that EPA's Clean Air Mercury Rule (CAMR) was inconsistent with the provisions of the Clean Air Act and would not result in reductions in emissions of mercury from coal-fired power plants adequate to protect public health. Specifically, the model describes two options and provides model rule language for state and local governments that wish to implement utility mercury rules that are more protective of public health and the environment than CAMR. The model requires expeditious application of state-of-the-art emission control technology at each plant and calls for two phases of reductions – 2008 and 2012. Ultimately, both options outlined in the NACAA model rule call for 90- to 95-percent capture of mercury by 2012.

RAPCA Supervisor, John Paul, appeared on OnPoint Energy and Environment TV to discuss NACAA's (formerly STAPPA/ALAPCO) mercury model rule. In the interview, Mr. Paul said that when U.S. EPA released its mercury rule earlier this year, states and locals said "we really need to go beyond this rule". Mr. Paul went on to say that a number of different states have already adopted their own mercury rules and that NACAA wanted to develop a rule that other agencies could use if they choose. "It's a model rule. It's flexible, but it has good controls. And it has different options that a state or local agency could pursue to adopt", stated Mr. Paul.

E-Check Ending In the RAPCA Area

Beginning January 1, 2006, the Ohio E-Check program was discontinued in southwest Ohio. The program, which began in 1996 to help areas meet attainment with the 1-hour ozone standard, was disbanded by the Ohio Legislature.

Over its decade long run, the E-Check program was instrumental in helping many areas across the state, including the Dayton/Springfield area, meet attainment for the 1-hour ozone standard. The E-Check program will be replaced with low Reid Vapor Pressure gasoline, new requirements for auto body spray guns, and improved gasoline cans. The Dayton area is expected to comply with the 8-hour ozone standard in 2009, regardless of the absence or presence of an E-check program.

RAPCA Submits Comments on EPA's Proposed PM_{2.5} Implementation Rule

RAPCA submitted comments on the proposed PM_{2.5} implementation rule in February, 2006. RAPCA noted the area is currently classified nonattainment for the PM_{2.5} standard. Modeling of air quality in 2009-2010 shows continued nonattainment for PM_{2.5}. This modeling assumes implementation of EPA's Clean Air Interstate Rule (CAIR) and various mobile source measures, including the Heavy Duty Diesel rule. Based upon our review of the PM_{2.5} SIP rule we presume that control measures beyond CAIR and planned mobile source controls will be necessary.

In the RAPCA area, transported sulfate dominates the PM_{2.5} concentration measured on high days in the summer months. This appears to skew the annual mean above the standard. The sources of sulfate precursors must be addressed, and this can be accomplished most effectively through the federal CAIR rule. CAIR must be made more stringent in the specified control levels for Electric Generating Units (EGUs), it must be more inclusive of major sources of SO₂ (adding cement kilns and industrial boilers), and it must be more timely in its implementation. For the RAPCA jurisdiction to reach particulate matter attainment we recommend the following to U.S. EPA:

- CAIR should be revisited and control requirements expanded to include major industrial boilers and cement kilns.
- Control levels should be strengthened to represent at least RACT and possibly BACT, if RACT controls, along with additional measures, are insufficient to provide for attainment of the National Ambient Air Quality Standards (NAAQS).
- EPA should abandon its proposals to exempt EGUs from New Source Review requirements for major modifications. We recommend that EPA adopt a "birthday provision" to assure all EGU's install BACT at some time in their lifetime. Such a provision would simplify the NSR process for modifications, but still assure good controls.
- EPA should hold the line on mobile source control measures, especially those for heavy duty diesels and support state and local efforts to fund diesel retrofit programs.

RAPCA firmly believe that stringent control of sources of emissions which form PM_{2.5} is essential for the protection of public health. We are concerned with the levels of PM_{2.5} measured across the United States today and the continuance of these unhealthy levels into the future. We feel strongly that control of EGUs is the primary key to the solution to this serious public health problem, and thus urge EPA to reconsider its CAIR and EGU NSR rules and adjust the PM_{2.5} SIP rule accordingly.

RAPCA Supervisor Testifies before the Ohio Senate Environmental and Natural Resources Committee and the Ohio House Economic Development and Environmental Committee

RAPCA Supervisor, John Paul, testified before the Ohio Senate Environmental and Natural Resources Committee and the Ohio House Economic Development and Environmental Committee in March, 2006, in opposition of Senate Bill 265 and House Bill 496.

According to bill sponsors, SB 265 and HB 496 were designed to streamline the process by requiring the Ohio EPA to adopt uniform rules, and will not hinder the ability of the Ohio EPA to set strict air quality standards.

In his testimony, Mr. Paul was vehemently opposed to each of the bills. Mr. Paul stated that these bills will do away with the case-by-case BAT determinations RAPCA currently conducts for new sources. The bill will totally eliminate BAT for new sources less than 10 TPY, after controls, and will require that Ohio EPA promulgate BAT rules for sources greater than 10 TPY within 3 years. For any source not covered in a BAT category, RACT is the applicable rule.

RAPCA Supervisors Testify on EPA's PM NAAQS Proposal

On March 8, 2006, RAPCA Supervisor, John Paul, testified on behalf of NACAA at the public hearings held in Chicago. Mr. Paul testified that EPA did not follow the advice of the Clean Air Scientific Advisory Committee (CASAC) to tighten the daily standard for PM_{2.5} in conjunction with lowering the annual standard.

EPA's proposed rule setting new or revised National Ambient Air Quality Standards for particulate matter was published in the *Federal Register* January 17, 2006. In it, EPA proposes lowering the daily standard for PM_{2.5} to 35 µ/m³ from the current 65 µ/m³ and also proposes a new PM coarse standard. In addition to opposing EPA's approach of lowering of the daily standard without the corresponding reduction in the annual standard recommended by CASAC, NACAA opposed the exemptions for agriculture and mining contained in EPA's PM coarse proposal, as well as the population-based monitoring siting provisions that would exclude rural and small town areas. Finally, the associations expressed serious concern that EPA ignored important funding issues associated with both deploying and operating PM_{2.5} and PM coarse monitoring networks.

Bruno Maier, Monitoring and Analysis Supervisor, testified on behalf of RAPCA.

Governor Taft Signs Executive Order to Delay Use of Low Reid Vapor Gasoline in Ohio

In April, 2006, Governor Taft signed an executive order to adopt emergency rules to delay the use of Low Reid Vapor Pressure (RVP) gasoline in Dayton and Cincinnati. As a result of a settlement with the American Petroleum Institute, Ohio EPA agreed to delay the rules for one year after U.S. EPA's approval of Ohio's State Implementation Plan to control ozone.

Since Ohio EPA anticipated using the emission reductions from the low RVP gasoline to replace the emissions reductions lost with the termination of the Ohio E-Check program, Ohio EPA will now be retiring new source NO_x set aside allowances. This will, in effect, reduce the amount NO_x emissions Ohio utility boilers can emit.

RAPCA Supervisor Testifies before the State of Montana's Board of Environmental Review

RAPCA Supervisor, John Paul, testified in May, 2006, before the State of Montana's Board of Environmental Review regarding their consideration to adopt a rule requiring the control of mercury emissions from the state's coal-fired utility boilers. The Clean Air Mercury Rule (CAMR) has been criticized by clean air advocates for not being protective of public health and the environment, prompting states like Montana to consider adopting their own, more stringent, mercury rule for coal-fired boilers.

Mr. Paul, who served as co-chair of U.S. EPA's Utility MACT Working Group and is the current president of the National Association of Local Air Pollution Control Officials, was asked to testify regarding the development of the federal rule and the state and local agency response. In his testimony, Mr. Paul stated that the mercury emission limits under CAMR are "too little, too late". Mr. Paul elaborated by saying that CAMR requires a 15 tons per year (TPY) cap by 2018, however because of emissions banking, actual mercury emissions in 2020, are expected to be 24 TPY and the 15 TPY cap is not predicted to be reached until some time after 2025.

RAPCA Announces the Greater Dayton Woodstove Changeout Program

In June 2006, RAPCA unveiled plans to launch a woodstove changeout program in the Dayton area. The program is based off of U.S. EPA's Great American Woodstove Changeout which uses monetary incentives to encourage current woodstove users to replace or "changeout" their old inefficient woodburning stoves with new, clean burning gas, pellet, corn or EPA certified woodburning stoves. Funding for the program has been made possible from a \$75,000 grant from Cargill. RAPCA is also receiving administrative support from U.S. EPA and the Hearth, Patio, Barbeque Association.

The basics of the program are as follows. Beginning July 15, RAPCA will provide Clean Air Coupons to help area residents replace their old woodstoves with new, cleaner-burning gas, pellet or corn stoves, or with woodstoves or fireplace inserts certified by the U.S. EPA. Residents can use the coupons for significant instant rebates at participating woodstove retailers.

Program participants must live in RAPCA jurisdiction (Clark, Darke, Greene, Miami, Montgomery, and Preble counties), must currently use a woodburning stove as their primary source of heat, and must agree to have the stove professional installed and agree to have their old stove removed and destroyed.

RAPCA Supervisor Speaks at Shared Air 2006 Summit in Toronto

In June 2006, RAPCA Supervisor, John Paul, was invited to speak at the Shared Air 2006 Summit in Toronto. Shared Air Summit brought together world experts to discuss issues such as transboundary air pollution, environmental health and climate change. Mr. Paul's presentation focused on the challenges state and local air pollution agencies are facing with respect to ozone and PM_{2.5} nonattainment status, mercury emissions, and new source review.

RAPCA Supervisor Testifies Before Senate on PM NAAQS

RAPCA Supervisor, John Paul, testified in July 2006, on EPA's proposed revisions to the particulate matter (PM) National Ambient Air Quality Standards (NAAQS) before the Clean Air, Climate Change and Nuclear Safety Subcommittee of the Senate Environment and Public Works Committee. Although Mr. Paul was invited to testify on behalf of the Regional Air Pollution Control Agency, he noted to the Subcommittee that his testimony was also endorsed by NACAA.

Mr. Paul highlighted the severe impacts of PM on health and welfare and articulated concerns with EPA's proposal to revise the PM NAAQS. He also commented on implementation of the current PM standards, stating that there are several actions Congress and EPA can take now that would assist states and localities in implementing the existing PM standard and also help make progress toward achieving the new PM standards. First, Mr. Paul urged for further reductions from the electric utility sector (beyond those called for in the Clean Air Interstate Rule) and for EPA to also pursue emission reductions from industrial boilers and cement kilns. Second, he urged EPA to issue the long-overdue final PM_{2.5}

implementation rule. Finally, he called on Congress to ensure that state and local air agencies have adequate funding and urged the Senate to restore the \$35.1-million cut proposed by the Administration in its FY 2007 budget.