



ARAQMD

Protecting the Air

Akron Regional Air Quality Management District

Annual Report for 2012

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Introduction

This report is designed to give an overall picture of the Akron Regional Air Quality Management District's (ARAQMD) activities in the calendar year 2012 and plans for the future.

ARAQMD underwent many changes in 2012 and there are many more to come. ARAQMD saw staff changes, organizational duty restructuring and plans to do much more to take the agency into the future as a model of best practices and to integrate the agency into the Summit County Public Health (SCPH) culture.

The report is designed to give insights into how our agency is structured, what each section of our agency does, and how we plan to take this agency into the future.

The administrative section will contain the fiscal status of this agency, the staffing changes undergone during last year, an organizational chart and a description of the future plans for the agency. The ambient monitoring section has monitoring data summarized to explain where the region is with respect to attainment of the National Ambient Air Quality Standards (NAAQS) and some other monitoring projects the staff undertakes. The enforcement section of the report contains a listing of the enforcement cases that are actively at the Ohio EPA or Attorney General's office and data about the activities of the enforcement staff. Finally, the permitting section has a summary of the activities of the permitting staff and the implementation of facility inspections.

Administrative Section

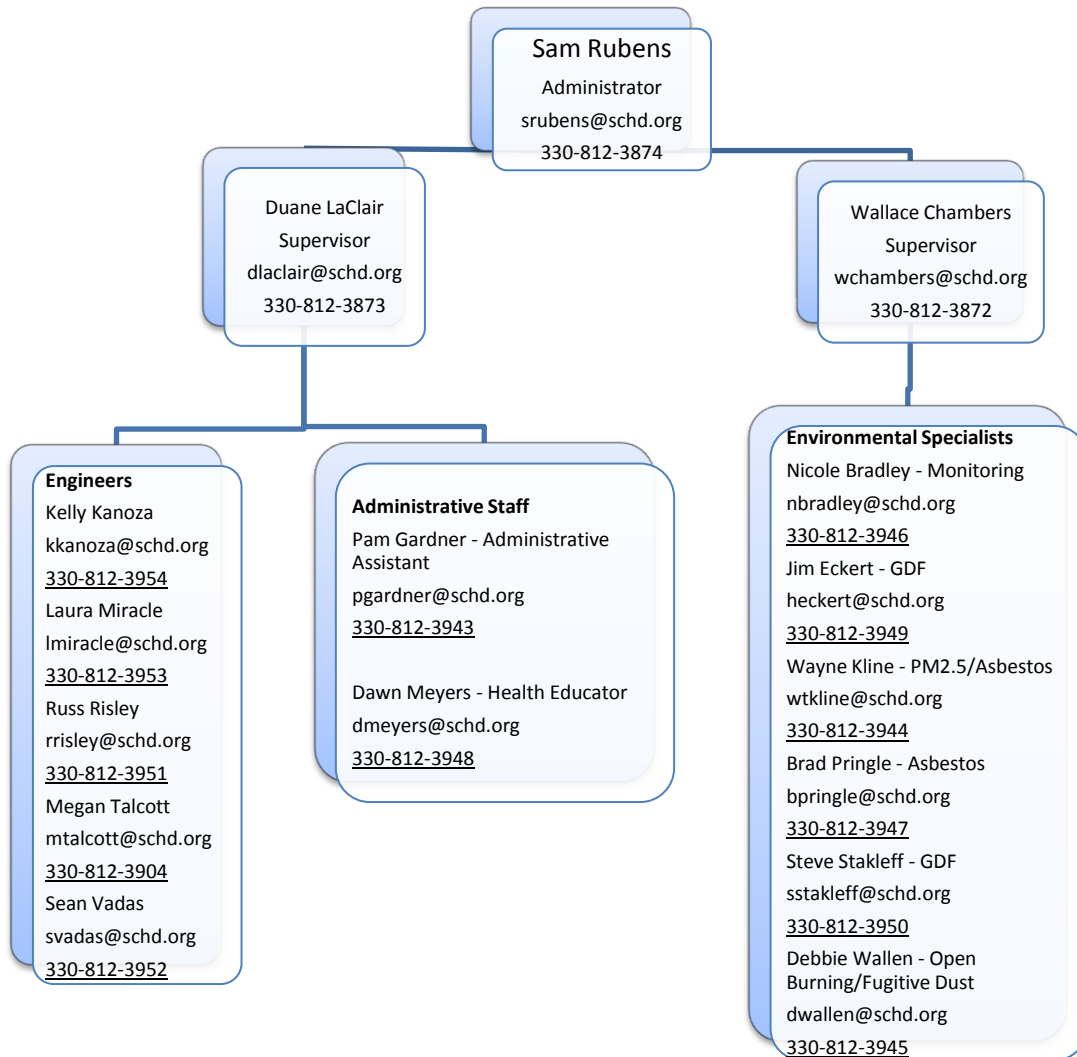
Staff Changes:

In May 2012, ARAQMD welcomed a new permit engineer, Megan Talcott, to the staff. Megan had previously been working on permits at the Northeast Division Office of the Ohio EPA.

In July 2012, Sam Rubens became the Administrator of the ARAQMD. Sam has been with ARAQMD since 1994, working in the ambient monitoring section and, as of May 2011, the supervisor of the environmental specialists for ARAQMD.

In October 2012, ARAQMD welcomed a new environmental specialist supervisor, Wallace Chambers. Wallace has been with the Akron Health Department and SCPH for 17 years. He has expertise in lead prevention and housing problems.

Figure 1: Organizational Chart



Local Fee Structure Changes

In a review of the ARAQMD local fees, it was determined that the structure was not the most equitable method of assessing fees. The structure was last revised in 1991 and was found not to be similar to those employed by other local air agencies (LAAs) in Ohio. Since a decrease in the agency’s funding is predicted in the near future, a revision of our local fee structure was deemed appropriate. It was determined that the local fees would be adjusted in accordance with the other LAAs. While the old structure was based on what kinds of equipment the facility used, regardless of emissions, the new structure is based on the type of permit issued and how much emissions the facility is allowed to emit. The allowable emissions are easily documented in the permit. If the facility makes changes to their processes, the changes can be verified by using the permit tracking system used to issue the permits. By tying the fees to the allowable emissions in the facilities permit, we can get a better picture of what

pollutant load is being emitted into the atmosphere each year. This more accurate reporting helps researchers and planners as well. The new fee structure is more equitable to the facilities in that the facility is charged by the permitted allowable emissions.

In the course of this revision, ARAQMD worked with the Air Quality Advisory Board, which is comprised of each of the local health departments in our service area (Medina County Combined General Health District, Portage County Combined General Health District, Ravenna City Health Department, Kent City Health Department and the Summit County Combined General Health District) and community members, to ensure that the fee structure was equitable and agreeable. Agreements were made with each of the local health departments to allow ARAQMD to assess and collect the fees in their respective areas for use for air quality purposes. Over 1000 notices were sent out to the regulated community to notify them of the upcoming changes and requesting comments. ARAQMD received and responded to six comments about the changes. Of the six, four were requests for a review of the charges to ensure that the correct amount was being assessed. The other two were negative comments, stating that there was too much governmental interference into their business and that the fees and charges from the government were becoming exorbitant. All comments were responded to in writing.

Due to some idiosyncrasies and the large increases seen by some facilities, some exemptions and discounts were made. Facilities with multiple permits-by-rule (PBRs) will be capped off at \$800. This discount will reduce the revenue by \$4200 overall. Municipality PBRs will be exempted. This will reduce the revenue by \$2650. Finally, as some entities will be seeing large increases, it was determined that these facilities would be gradually brought to the actual fee over a three year period to lessen the financial burden. If an entity is expected to see a greater than 400% increase and the final fee is over \$400, they were put into a three year gradual fee plan.

Table 1: Local Fee Revenue

	2011 (actual)	2012 (to be billed)	2013 (projected)	2014 (projected)
Facilities	371	1040	1040	1040
Revenue	\$111,986	\$223,890	\$248,929	\$276,318

Future Plans

Strategic Plan

ARAQMD is in the process of generating a strategic plan to allow for more effective and efficient use of the public funds. We will be conducting projects to increase awareness of our agency name so that the work we do can be recognized and we can become models of best practices for other LAAs across Ohio and the nation. The staff has been involved in many stages of the strategic planning process and there is great buy-in for this project.

Through staff discussions, we have created a mission statement, and identified public relations, communication with the constituents and quality improvement as topics to be focused on initially, with other goals and objectives to be identified in upcoming meetings. The aim of the ARAQMD strategic plan is to identify goals and objectives, which follow the mission statement, to guide the agency towards a

five year future plan. The plan will be reviewed and revised annually with input from staff and management and the changes will be submitted to the ARAQMD Advisory Board for approval.

The mission statement which will direct ARAQMD into the future is:

The mission of the Akron Regional Air Quality Management District (ARAQMD) is to protect the public from the adverse health impacts of air pollution.

Equipment Upgrades

We are embarking on a path to bring our office and equipment up to date. We purchased three Ford Fusion hybrid vehicles to replace aging and inefficient vehicles according to our replacement schedule in 2012 and plan to replace all the vehicles in our fleet with hybrid or other vehicles which reduce the emissions generated by our staff as they travel across the region. We will also begin replacing office equipment, such as printers, with environmentally friendly options when these pieces of equipment require replacement. Part of the SCPH mission is to create a healthful environment and as we make these changes with that in mind, we will be helping reduce the levels of pollutants emitted into the atmosphere.

Public Outreach and Education

ARAQMD is in conversation with Kent State University's (KSU) School of Public Health, and a proposal is being developed for presentation to the Akron Public Schools, to get into the classroom and educate students on air quality topics and issues. The goal of this project is to spark interest in these students and that they will steer their education towards the field of air quality. Once the topic of air quality is introduced and interest is fostered and mentored, the pool of prospective applicants for air quality jobs will be improved and the entire field of air quality can benefit. A project that may be of interest to the younger students is one where air quality monitors can be purchased or some of the obsolete equipment that ARAQMD has in storage can be used to demonstrate how air quality is measured or in special data projects where the students would design, monitor and analyze air quality data. This will allow staff from ARAQMD to interact with students and teachers to mentor those who have an affinity for this field. SCPH staff members have also been interacting with students from the KSU and University of Akron (UA) Nursing Schools and the medical students at the Northeast Ohio Medical University (NEOMED) for the past two years. This project allows the students to get an understanding of the work that environmental specialists and registered sanitarians do in the field. This helps the medical professionals and the environmental and public health interests become aligned more closely.

As part of the public outreach and education that ARAQMD does, we publish a quarterly newsletter, *The Air You Breathe*. The newsletter is mailed to over 1200 addresses and over 100 are emailed to readers. We are currently attempting to change the hardcopy subscribers to the emailed version to save on the environmental cost of publishing the newsletter. The newsletter is archived on the ARAQMD website as well.

Changing the common name of the agency

Another project to be undertaken in 2013 is to rebrand the agency. We are currently making the transition from referring to ourselves as the Akron Regional Air Quality Management District to the

acronym, ARAQMD. By consistently referring to the agency by one name, we can begin to generate an identity for the agency. A new logo is being created to go along with the new name. The official name of the organization will remain as Akron Regional Air Quality Management District, but the common agency name will be the acronym, ARAQMD, which is pronounced “ah-RACK-mid”.

One final plan is to begin preparations for the agency’s 50th year of existence as part of the health department in 2015. Although the agency was formed in 1947 as a smoke abatement committee, it was officially formed as an agency January 1, 1965. We plan to have an event to acknowledge this historic event and involve the ARAQMD family of retirees, partners and former employees.

Ambient Monitoring Section

Air Quality Index

Twice every weekday, ARAQMD reports the Air Quality Index (AQI) to the public by means of the ARAQMD website at <http://araqmd.org/AQI.html>, the agency Facebook page and the Air Quality Information line at 330-375-2545. The AQI is intended to advise the public of the potential health effects of the ambient air pollution. The AQI has six categories which have AQI values assigned. The AQI categories and the values are; Good (0-50), Moderate (51-100), Unhealthy for Sensitive Groups (101-150), Unhealthy (151-200), Very Unhealthy (201-300), and Hazardous (301-500).

Figure 2: Daily Maximum AQI for Summit County, 2012

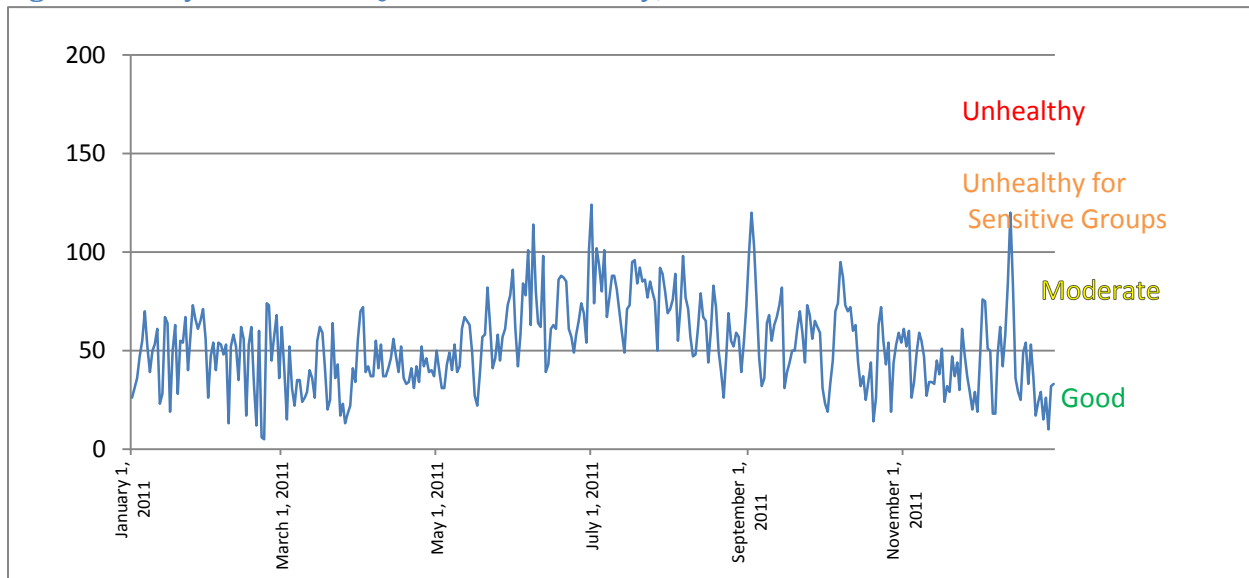
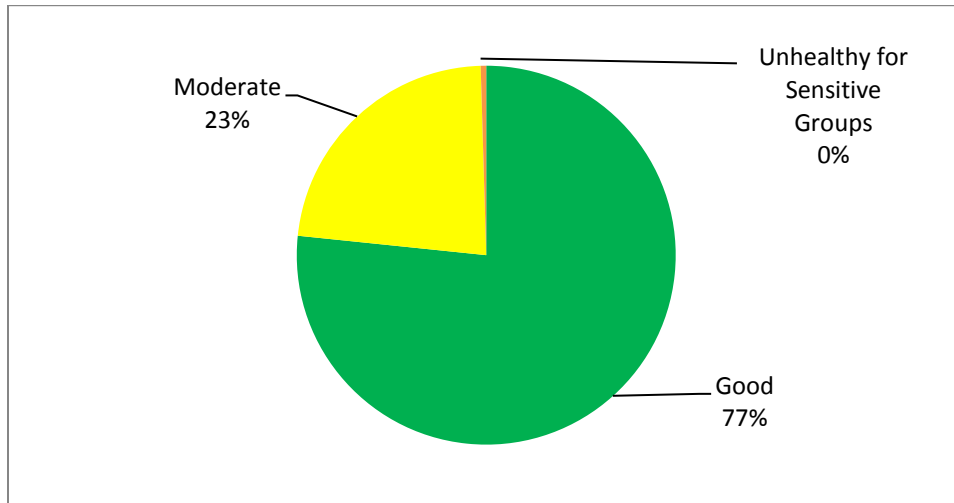


Figure 3: AQI 2012 by Category



Pollen Sampling

The ARAQMD staff begins collecting and analyzing pollen on April 1 of each year and the season runs through the beginning of October or until the first killing frost. Figure 4 shows the weekly averages of the pollen count for the years 2010 to 2012. The peak of the pollen season is usually in the second week of May each year; the peak appeared in April in 2010 due to early and exceptionally warm temperatures. In 2012, due to the very warm and wet winter that was experienced, the pollen count was started at the end of February. There are three seasons each year; tree pollen which occurs in the beginning of the season, grass season which follows the tree pollen and finally the ragweed season that comes in August and September. In the extended 2012 pollen season, the different trees had time to produce pollen at different times. Usually, the springtime pollen season will force all the trees to pollinate at one time, which leads to a very high pollen count for a short time. In 2012, we saw a lower maximum count, but over a longer time period. Definite spikes were seen for pine, oak and maple tree pollen. In Figures 4 and 5, the pollen and ragweed counts can be examined in more detail.

Figure 4: Pollen Counts by Week, 2010-2012

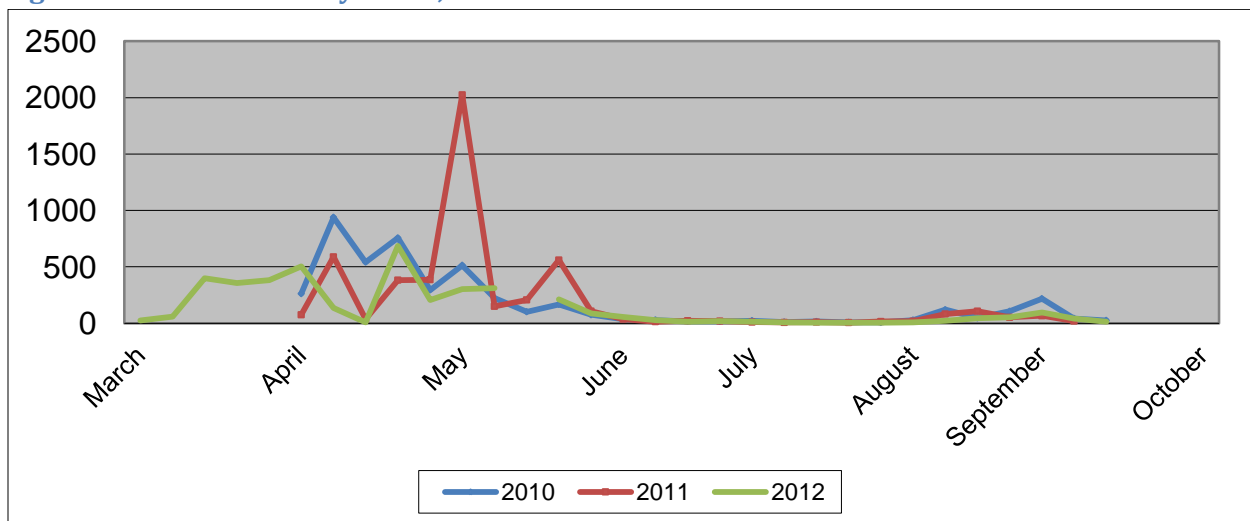
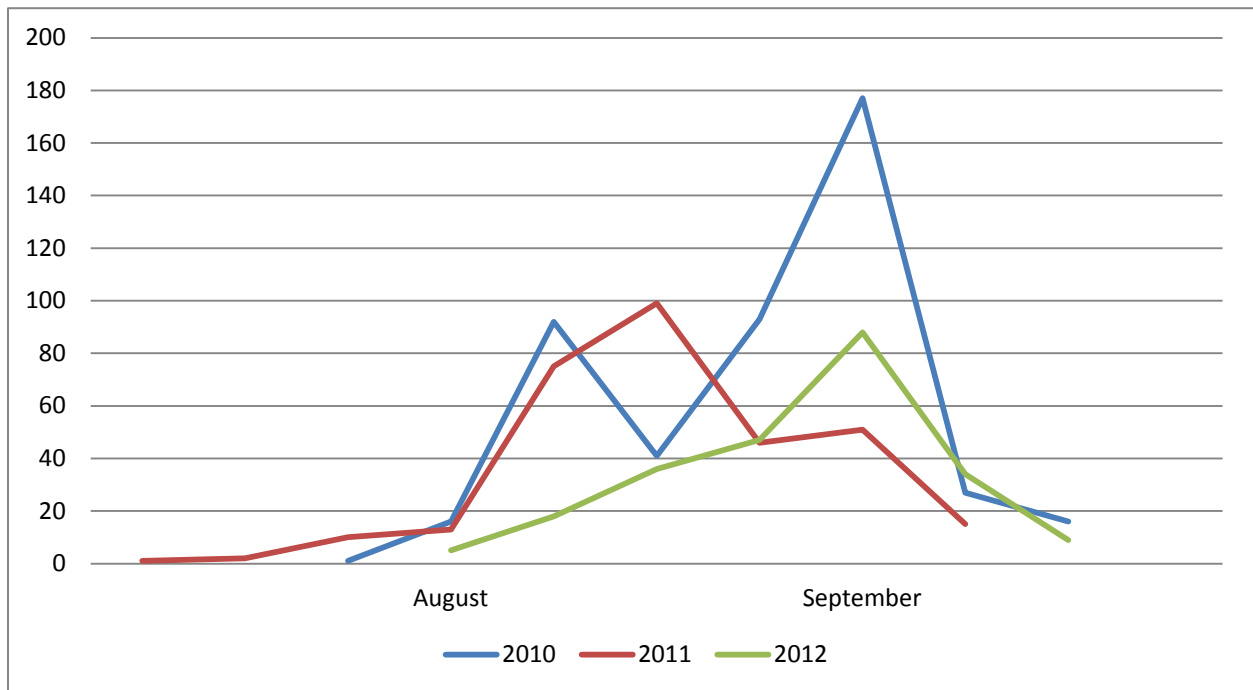


Figure 5: Ragweed Counts, 2010-2012



Each year since 2008, all pollen and ragweed daily counts are analyzed and the pollen count value at the 5th, 10th, and 25th percentile are calculated and published as the breakpoints for categorization of the next year's daily counts. These correspond to the categories of good, moderate and high. Table 2 lists the ranges for use in the 2013 pollen season.

Table 2: Pollen and Ragweed Ranges for 2013 season

	Tree and Grass Pollen	Ragweed Pollen
Good (50 th %ile)	0-34	0-18
Moderate (25 th %ile)	35-102	19-52
High (10 th %ile)	103-285	53-111
Very High (5 th %ile)	286+	112+

National Ambient Air Quality Standards

The National Ambient Air Quality Standards (NAAQS) were devised in the 1970 Clean Air Act and are supposed to be reviewed and, if necessary, revised every five years. The review of the NAAQS are started by a rigorous scientific study done by the Clean Air Scientific Advisory Committee (CASAC), an independent group that was created to advise the EPA in scientific matters, who then make recommendations to the EPA as to what the scientific research shows that the levels of certain pollutants should be to adequately protect human health. The mode of the NAAQS is generally given in a concentration per time period or volume of air. The newer NAAQS are given as a 98th percentile of all data collected being under a certain level or an average of the 98th percentile values being less than a certain level.

The CO NAAQS was reviewed in 2012 and found to be sufficient in protecting the public health; and the PM_{2.5} NAAQS was reviewed and lowered to 12.0 ug/m³ for the annual mean.

Table 3: 2012 NAAQS

Pollutant	Level	Averaging Time	Attainment Requirement
Carbon Monoxide (CO)	9 ppm	8 hour	2 nd high
	35 ppm	1 hour	2 nd high
Lead (Pb)	0.15 ug/m ³	Rolling three month average	
	1.5 ug/m ³	Quarterly	
Nitrogen Dioxide (NOx)	53 ppb	Annual Mean	
	100 ppb	1 hour	3 year average of the 98 th percentile value
Fine Particulate Matter (PM _{2.5})	12.0 ug/m ³	Annual Mean	
	35.4 ug/m ³	24 hour	3 year average of the 98 th percentile value
Ozone (O ₃)	75 ppb	8 hour	3 year average of the 98 th percentile value
Sulfur Dioxide (SO ₂)	30 ppb	Annual Mean	
	140 ppb	24 hour	
	75 ppb	1 hour	3 year average of the 99 th percentile value

Exceedances of the NAAQS in 2012

There were no exceedances of the NAAQS in 2012 for SO₂, CO or PM_{2.5}. The O₃ monitors had very few exceedances in 2012; all three monitors exceeded the NAAQS on June 28th and Patterson Park exceeded on June 29th.

Pollutants

Particulate Matter with a Diameter of less than 2.5 microns (PM_{2.5})

In 1987, the USEPA made a change from total suspended particulate (TSP) to coarse particulate matter. PM₁₀ is made of particulate which can reach the thoracic region or upper lung area of humans. Upon review in 1997, the USEPA changed focus from PM₁₀ (coarse particulate matter) to PM_{2.5} (fine particulate matter) in the ambient air. The PM_{2.5} can be inhaled into the lower lung region and is hard to exhale. Once in the moist and warm lower regions of the lungs, chemical reactions can occur and the chemicals in the particulate matter can become dissolved and be transported across the lung membrane into the blood stream.

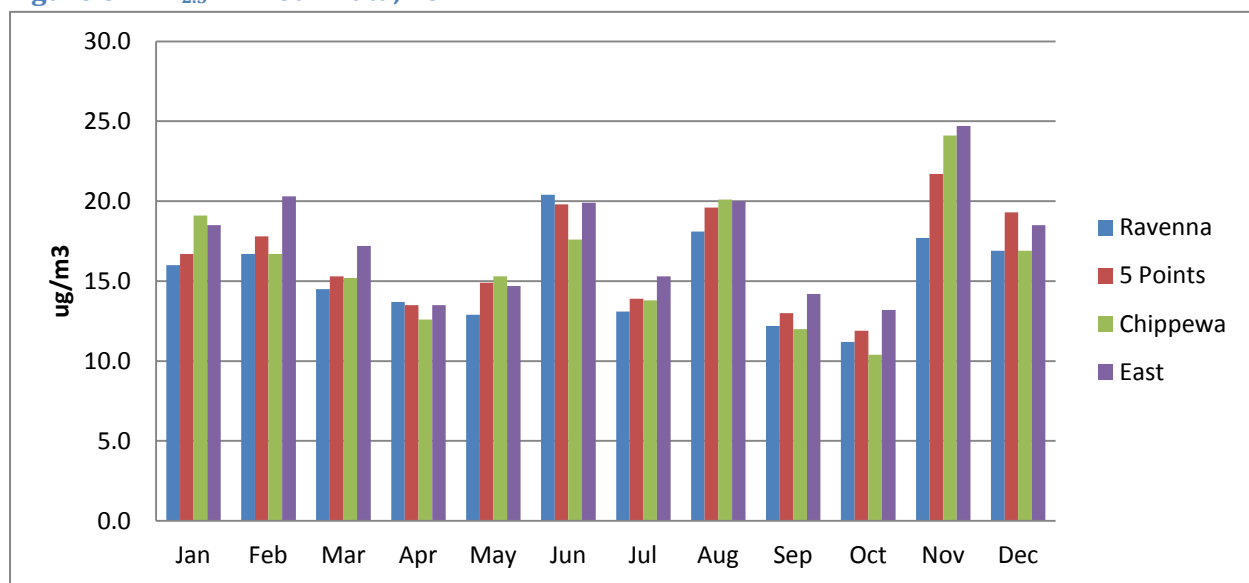
There are two NAAQS for PM_{2.5}. The first is a 12.0 ug/m³ annual arithmetic mean, averaged over three consecutive years. The second is a 35 ug/m³ 4th high 24 hour average. This standard is attained when the 4th highest 24 hour average, averaged over 3 consecutive years, is less than 35 ug/m³.

ARAQMD's monitoring network for PM_{2.5} consists of two continuous monitors located in Medina and Summit Counties, intermittent Federal Reference Method (FRM) monitors located in Summit, Portage and Medina Counties and speciation monitors located in Summit County. The intermittent monitors are used to determine if the region is in attainment with the NAAQS. The continuous monitors are used to determine the Air Quality Index (AQI) and research projects which can help determine where particulate matter comes from, forecasting the AQI, and health effects. The speciation monitors are used for research projects, which determine the composition of the particulate matter and allow for controls to be put into place to minimize those sources.

ARAQMD has accumulated monitoring data to demonstrate attainment for PM_{2.5}, and is in the process of becoming designated as in attainment. The ARAQMD region has seen a 72% decrease in PM_{2.5} since the inception of the program in 1999.

Below are graphs showing the maximum 24 hour concentrations of fine particulate matter by month for 2011.

Figure 6: PM_{2.5} 24 Hour Data, 2012



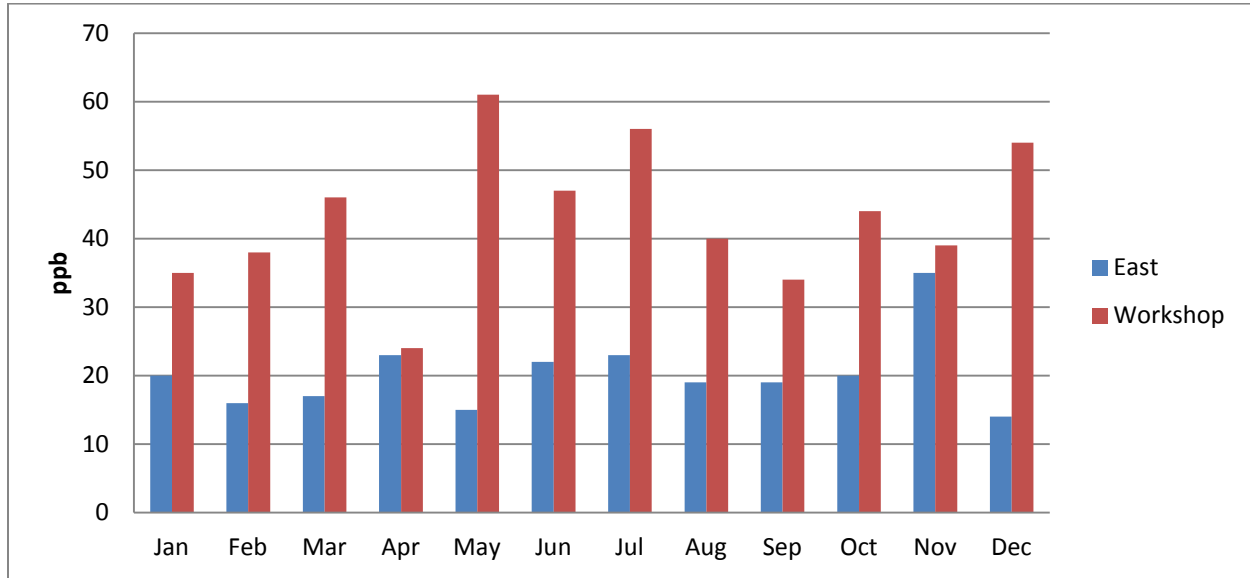
Sulfur Dioxide (SO₂)

SO₂ is formed when sulfur-containing compounds are combusted. Most SO₂ in the air is caused by burning coal and smelting processes. Low-sulfur gasoline and coal are the goals for minimizing SO₂ production. SO₂ can be converted to sulfuric acid when it reacts with moisture in the air, on plants or in the lungs. Sulfuric acid is one of the most corrosive acids found in nature. If SO₂ is converted to sulfate (SO₄), it can be a lung irritant as well.

The monitoring network for SO₂ is comprised of two monitors located in Akron. One location is a downtown canyon site and the other was started to monitor emissions from a major tire company.

ARAQMD is in attainment for sulfur dioxide. The ARAQMD region has seen a 76% decrease in the annual mean of SO₂ since 1977.

Figure 7: SO₂ 1 Hour Data, 2012



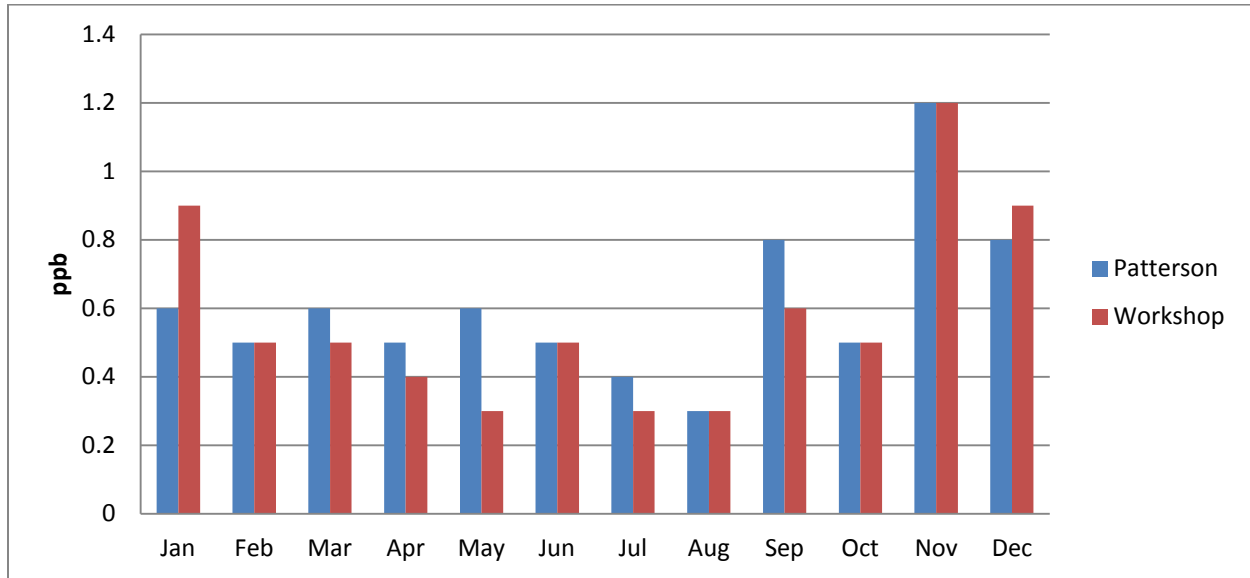
Carbon Monoxide (CO)

CO is a colorless and odorless gas, and is an asphyxiant. It is formed by the incomplete combustion of carbon containing fossil fuels. 95 percent of the CO in the urban airspace comes from anthropogenic sources. CO binds to the hemoglobin in blood which minimizes the amount of oxygen the blood can carry throughout the body.

ARAQMD's monitoring network for CO includes two monitors in Akron. One is downtown; to monitor the vehicle traffic's contribution to the pollution in the Akron area and the other is a background neighborhood site.

ARAQMD is in attainment for carbon monoxide. The ARAQMD region has seen an 86% decrease in the 1 hour maximum concentrations of CO since 1977.

Figure 8: CO 8 Hour, 2012



Ozone (O₃)

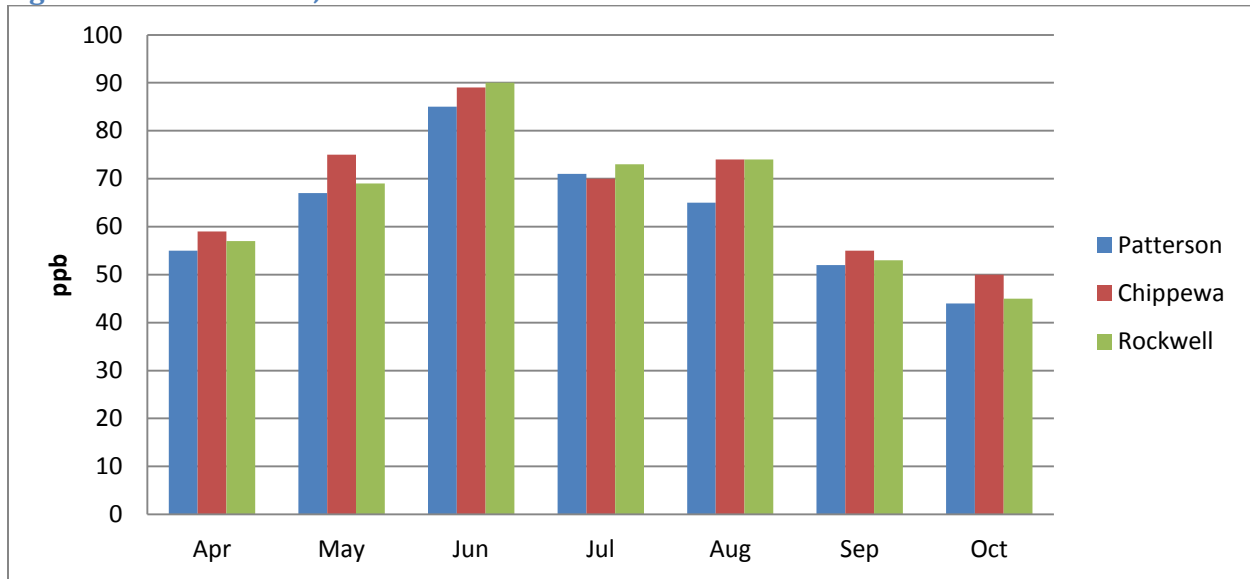
O₃ is the only criteria pollutant that is not directly emitted into the atmosphere. It is created by chemical reactions in the ambient air. When volatile organic compounds and oxides of nitrogen are in the presence of ultraviolet light, ozone is formed. The health effects of ozone have been demonstrated in various ways. Reduction in lung function in normal, healthy people during periods of moderate exercise have been shown, and irritation of the eyes, mucous membranes and respiratory system are also possible.

The NAAQS for ozone has changed radically in the past few years. Until 1997, the NAAQS was a fourth highest one hour maximum of 125 ppb each year. In 1997, the one hour standard was left in place and a new method of evaluating the pollution was put into place. The eight hour fourth highest average over three consecutive years must be less than 84 ppb to be in attainment. In 2006, the one hour standard was revoked. In 2009, a new standard was enacted and was upheld by the courts in 2012. The newest NAAQS is a three year average of the fourth highest eight hour standard. This must be below 75 ppb for a three year period.

ARAQMD has three ozone sites, one each in Medina, Summit and Portage County.

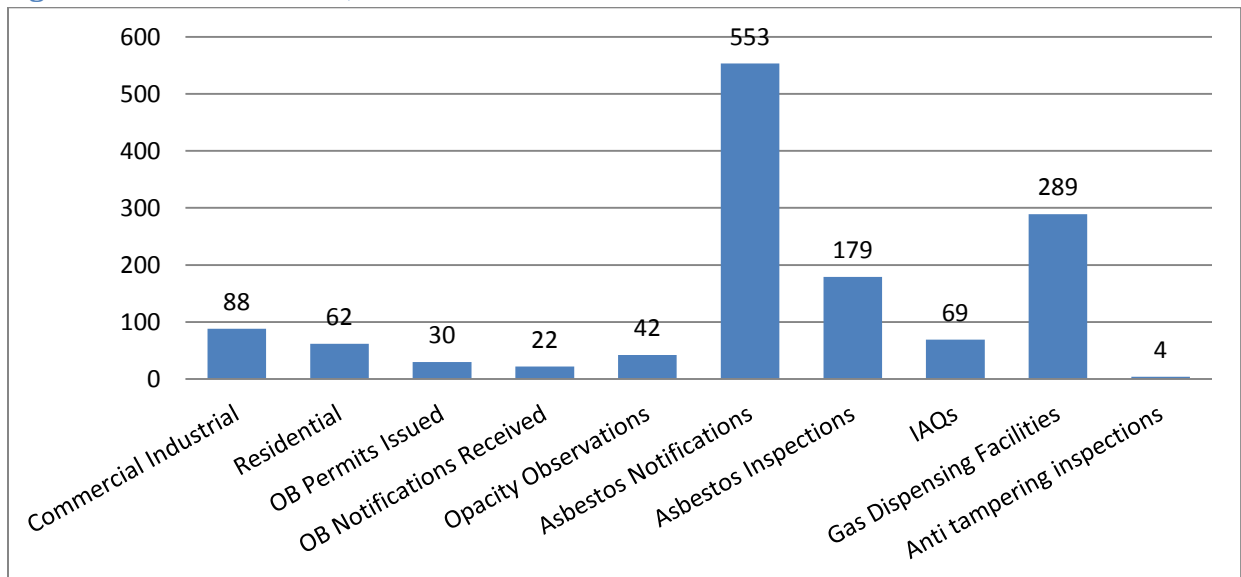
ARAQMD is in attainment for the 2006 ozone standard, but will not be in attainment for the 2009 proposed range. The ARAQMD area has seen a 44% decrease in the 1 hour maximum concentration of ozone since 1977.

Figure 9: Ozone 8 Hour, 2012



Field Activities

Figure 10: Field Activities, 2012



Open Burning

ARAQMD staff members are responsible for inspecting incidents where open burning or fugitive dust occurs. Open burning is defined by Ohio Administrative Code 3745-19 as “the burning of any materials wherein air contaminants resulting from combustion are emitted directly into the air without passing through a stack or chimney.” There are regulations on the location where burning may occur, what may be burned and when the burning can happen and who may conduct the burning. Notification must be made to ARAQMD to obtain a permit at least 10 working days prior to the intended burning. As can be

seen in Figure 10, 30 open burning permits were issued. ARAQMD inspectors investigated 71 complaints in 2012.

Fugitive Dust

Fugitive dust is regulated by the Ohio Administrative Code 3745-17-08. Fugitive dust can come from many sources such as; companies, furnaces, roadways, parking lots, disturbing dirt while tilling farmland or digging, or other mechanical anthropogenic sources. The regulations for fugitive dust require that there must be reasonably available control measures to minimize dust release when transporting, storing, or handling dust. Some control technologies are the use of water, asphalt or oil to suppress the dust, installation of hoods or fans to enclose, contain, capture, vent and control the fugitive dust. The ARAQMD staff members will inspect fugitive dust problems on a complaint-driven basis.

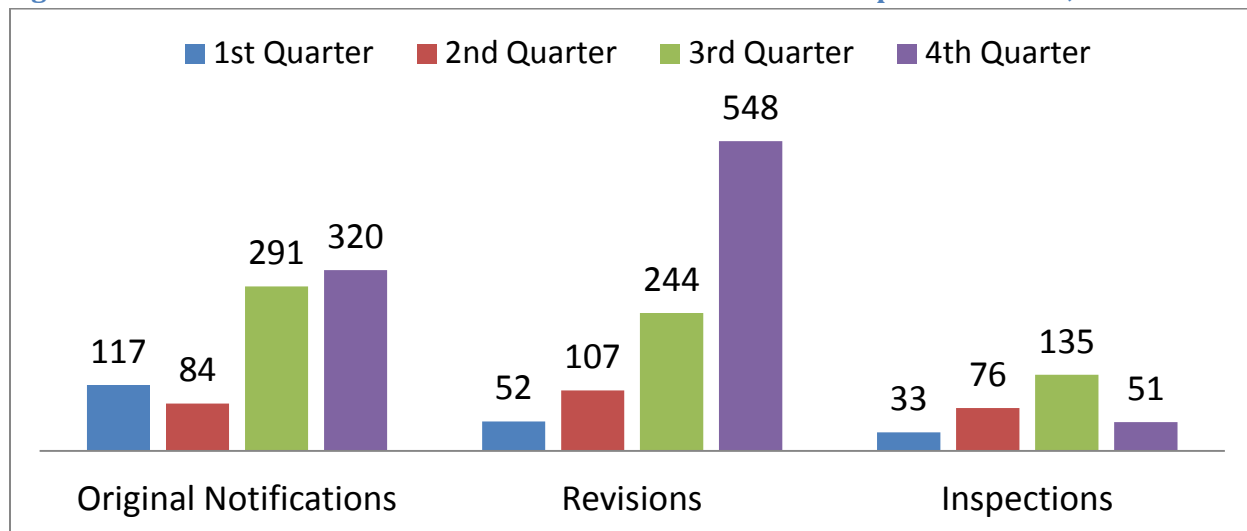
Asbestos

Asbestos is a naturally occurring mineral which was used as an insulating compound on pipes and houses until the 1950s. When properly encapsulated, asbestos is very useful. When asbestos is disturbed or is at the surface of the material it is in, the asbestos fibers can fracture and become airborne. This process is termed "friable." Studies have shown that when friable asbestos is inhaled, it can have a lengthy residence time in the lungs and cancer risk is increased significantly.

The ARAQMD staff is responsible for receiving notifications and revisions from asbestos remediation companies, processing the paperwork, inspecting the work being done and ensuring that the remediation work is done correctly to minimize exposure to asbestos to workers and accidental release to the ambient air. ARAQMD inspectors achieved the 15% inspection rate on initial asbestos NESHAP notifications received as required in our contract with OEPA.

Around August 2012, the Moving Ohio Forward program was put into place where counties and/or land banks received money from the Attorney General's office to demolish blighted, abandoned or vacant structures. ARAQMD saw a huge increase in asbestos notifications and revisions due to this activity as shown in Figure 11.

Figure 11: Asbestos Notifications and Revisions Received and Inspections Done, 2012



Indoor Air Quality

ARAQMD's Indoor Air Quality (IAQ) Program has been in place since 1993 and has assisted in over 3500 indoor air quality complaints in residential, commercial and school settings. In 2012, the program handled almost 100 inquiries. Some of the most common topics are mold, carbon monoxide and soot buildup from candle burning. The indoor air staff members are educated to provide the latest information about air quality issues and health effects and how best to help the public protect their health. The IAQ program is designed to be a neutral, third-party source of information. As such, the program does not perform remediation or maintain a list of companies who do. The ARAQMD IAQ Program is available for those who work or reside in Summit, Medina or Portage Counties.

Gas Dispensing Facilities

Gasoline is a volatile organic compound (VOC), and very integrated into our culture. Due to the widespread availability of gasoline, gas dispensing facilities (GDF's) are subject to regulation by the Ohio EPA. Since the ARAQMD region is in non-attainment for ozone, all GDF's in the region must utilize a Stage II vapor recovery system. A Stage II vapor recovery system includes a special nozzle, boot and collection system for the vapors that are displaced when a tank is filled. This tank can either be the underground storage tank at the GDF or other vapor management control systems.

All GDF's in the region are required to perform leak tests on the vapor recovery system annually, and every five years a more rigorous test must be done. These tests should be witnessed by a member of the ARAQMD GDF enforcement team. The GDF operators are also required to keep records of maintenance, repair or modifications done to the system, and the quantity of gasoline delivered each month to the facility.

The goal of ARAQMD's inspectors is to witness the annual leak test at every one of the almost 300 GDF's in the region each year. The inspectors are responsible for scheduling the tests, maintaining the records for the tests, and submitting the reports to the Ohio EPA.

Permitting Section

As a contractual agent of the Ohio EPA, ARAQMD is responsible for administering the Division of Air Pollution Control (DAPC) permitting program requirements for sources of air contaminants in Medina, Summit, and Portage counties. This process typically begins by conducting timely administrative and technical reviews of all permit applications received in accordance with established Ohio EPA rules, policies, and guidelines. The application review also includes federal rule applicability determinations based on criteria cited in the New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Achievable Control Technology (MACT), Prevention of Significant Deterioration (PSD), Nonattainment New Source Review (NSR), etc. There are a variety of permit options available depending on the type of source, existing air quality where the source is located, operational flexibility needed by the source, and whether additional voluntary restrictions are included in the permit. In addition, there are several types of permit exemptions that range from not being subject to regulation (*de minimis* operations emitting less than 10 pounds per day) to permit-by-rule (PBR) exemptions (restrictions and obligations that must be complied with, but no permit document is generated).

Types of Sources:

Title V/Major Sources are defined as facilities with potential emissions of 100 tons per year or more of any one regulated pollutant (PM₁₀, NO_x, SO₂, CO, VOC, and lead); 10 tons per year or more of any one hazardous air pollutant (HAP); or 25 tons per year or more of any two or more HAPs. These facilities usually have very complex permitting requirements (e.g., medium to large sized industrial operations, utilities, refineries, etc.).

Synthetic Minor Title V (SMTV) Sources are defined as facilities with potential emissions above at least one major source permitting requirement and/or Title V threshold, which have agreed to voluntarily restrict operations and the quantity of air contaminants emitted in order to avoid major source/Title V status.

Non-Title V (NTV)/Minor Sources are smaller emitting facilities, naturally below major source/Title V thresholds, with generally less complicated permitting requirements (e.g., small industrial operations, dry cleaners, gas stations, etc.).

Types of Permits:

Permit-to-Install (PTI) – A permit issued for any new or modified source that is located at a Title V facility. It is effective for the life of the source, or until the next modification.

Title V Permit-to-Operate (Title V PTO) - A comprehensive, facility-wide permit that identifies all regulated operations at a Title V facility. It has a five-year effective period.

Permit-to-Install and Operate (PTIO) - This permit document is issued to NTV and SMTV facilities. It is a relatively recent permit document type. Effective June 30, 2008, Ohio EPA began issuing a single PTIO (rather than a PTI, followed by a separate PTO) in order to streamline

the permitting process for air contaminant sources at non-major facilities. The PTIO has a ten-year effective period.

Federally Enforceable Permit-to-Install and Operate (FEPTIO) - This is a specific type of PTIO issued with federally enforceable limitations that restrict the facility-wide potential to emit in order to avoid various regulations. It has a five-year effective period.

Permit by Rule (PBR) - A permit-by-rule (PBR) is a specific permit provision in the Ohio Administrative Code (OAC) that applies to certain types of low-emitting air pollution sources. Companies may use the PBR as an option in place of the more formal air pollution permit known as the permit-to-install and operate (PTIO). The PBR provisions contain qualifying criteria, emission limitations, and conditions for operation and requirements for record keeping and reporting. Many of these requirements are similar or identical to those found in PTIOs issued by Ohio EPA for these types of sources. The air pollution source must continually meet all of the PBR criteria to legally operate under the PBR. Ohio EPA retains the authority to deny or revoke a company's ability to operate under the PBR provisions and to require the company to obtain a PTIO. A PBR is not issued. A facility submits a PBR notification form for a specific source and operates the source in accordance with the terms and conditions specified in the applicable rule.

Once the preliminary and technical review of the application is complete, ARAQMD's engineering staff develops the facility-wide and emission unit specific permit terms and conditions. The permit terms specify limits on the quantity of air contaminants emitted and requirements for the operation of regulated air contaminant sources. Permit terms can also specify emission testing, monitoring, record-keeping, and reporting requirements necessary to demonstrate compliance with the established emission limits. The working copy of the permit is then submitted to the Ohio EPA for final review and issuance. During 2012, ARAQMD's staff processed 163 PBR exemptions and 149 final permits.

Figure 12: 2012 ARAQMD Issuance by Permit Type

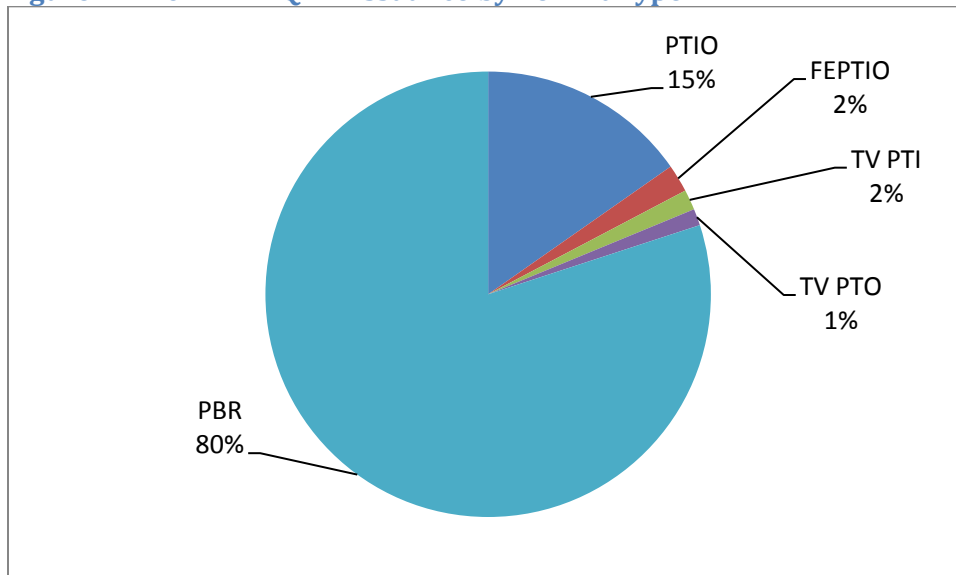
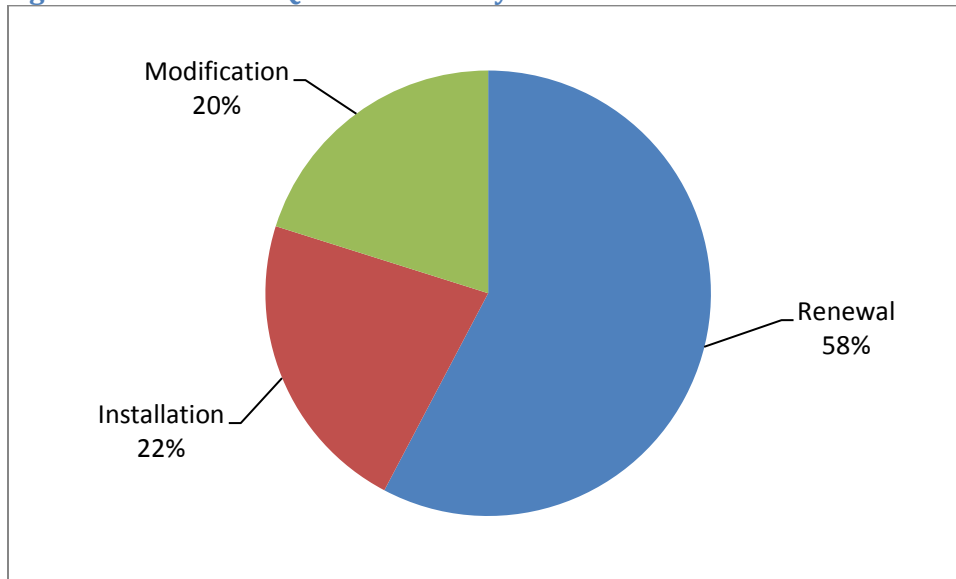


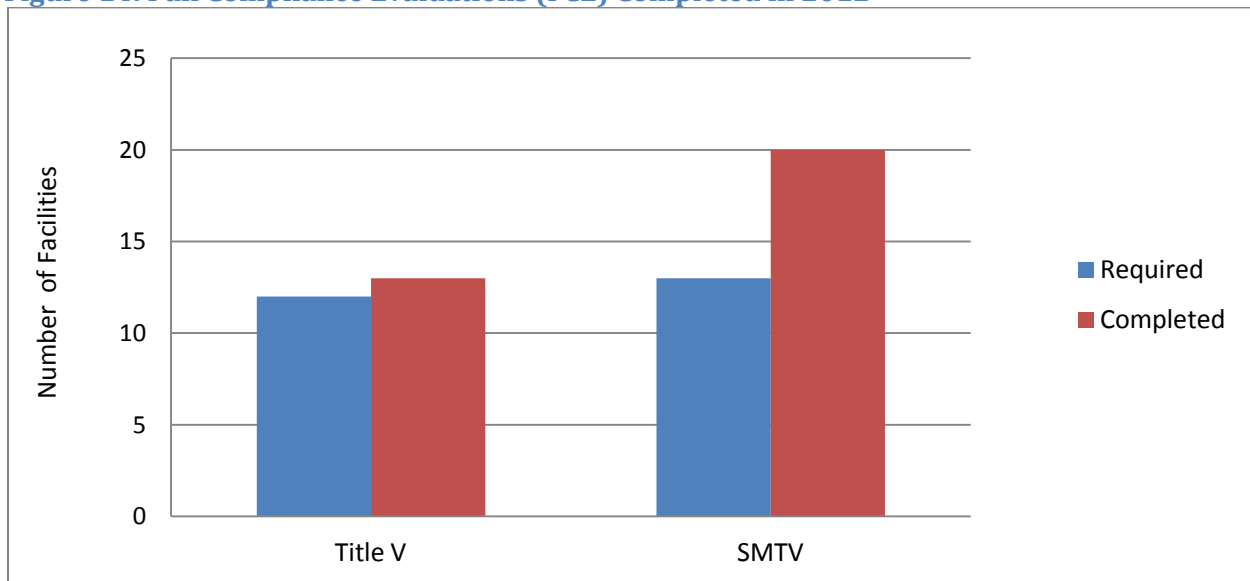
Figure 13: 2012 ARAQMD Issuance by Permit Reason



Permitted Facility Inspections

After permit issuance, ARAQMD's staff continues to monitor the compliance status of air contaminant sources by periodically reviewing required monitoring data, records and reports. This includes witnessing a minimum of 50% of all performance tests conducted in ARAQMD's jurisdictional area, and reviewing test results to verify proper methodology and procedures were used to demonstrate compliance with permitted emission limitations. A total of 31 stack tests were performed in 2012, and 28 of those were witnessed by ARAQMD staff. Scheduled and unannounced facility inspections are also conducted to ensure air contaminant sources are in compliance with applicable permit terms, and state and federal regulations. Under contract with Ohio EPA, ARAQMD is required to inspect at least 50% of all Title V sources and 20% of all SMTV facilities each year. There are a total of 23 Title V facilities, 65 SMTV facilities, and 426 NTV facilities located in ARAQMD's 3-county jurisdictional area. A total of 13 TV facilities and 20 SMTV facilities were inspected in 2012.

Figure 14: Full Compliance Evaluations (FCE) Completed in 2012



During the course of discussions about the local fee structure changes, it was a common theme that more interaction was desired between ARAQMD and the regulated NTV entities. To address this concern, a minor-source inspection schedule will be put into practice starting in 2013.

Enforcement Section

In 2012, ARAQMD had several enforcement cases resolved. Among those was Bemis Company, which agreed to Director's Final Findings and Orders on 2/22/12, Moser Construction, where a magistrate in the Portage County Court rendered a summary judgment against the company for \$25,000, and OMNOVA, which agreed to DFFOs for \$63,000. There were two GDF cases which were dropped due to changes in ownership and subsequent adherence to the regulations by the new owners.

Conclusion

In 2012, ARAQMD has seen a lot of changes and once the processes planned for 2013 and beyond commence, many more changes will be underway. ARAQMD will continue its journey to the future towards the goal of becoming a model of best practices. The staff of ARAQMD is looking forward to continuing the good work they have been doing and expanding the roles of the agency in protecting the public from the adverse effects from air pollution.