



Regional Air Pollution Control Agency
Serving Clark, Darke, Greene, Miami, Montgomery and Preble Counties
117 South Main Street, Dayton, Ohio 45422-1280
V: 937-225-4435 F: 937-225-3486
www.rapca.org



April 13, 2015

Ozone Advance
Attn: Laura Bunte
Mailcode: C304-01
U.S. Environmental Protection Agency
OAQPS
109 TW Alexander Drive
Research Triangle Park, NC 27711

Dear Ms. Bunte:

The Regional Air Pollution Control Agency (Dayton, Ohio) in collaboration with the Miami Valley Regional Planning Commission and the Dayton Regional Green Initiative submits the attached update report for our Ozone Advance program. Stakeholder feedback has resulted in actions to enhance public online information as well as local initiatives for clean school buses and anti-idling, in addition to RAPCA's mandatory regulatory implementation activities.

The Dayton-Springfield area is currently designated attainment for all NAAQS, including ozone. We are working to accomplish additional reductions in transported and local pollution, with the goal of timely attainment of the upcoming ozone NAAQS.

If you have any questions on the attached report, please contact Brian Huxtable of my staff or Matt Lindsay of MVRPC.

Sincerely,

Jennifer Marsee
Bureau Supervisor, RAPCA

ec: Matt Lindsay, MVRPC (mlindsay@mvrpc.org)
Brian Huxtable, RAPCA (bhuxtable@rapca.org)
Steve Rosenthal, U.S. EPA Region 5 (rosenthal.steven@epa.gov)

BACKGROUND

The Regional Air Pollution Control Agency is a local air agency covering six counties in SW Ohio centered on Dayton, Ohio. On April 30, 2012, the former RAPCA Administrator signed up for the Ozone Advance program. In the signup letter, he noted that the Dayton-Springfield area was designated attainment for 1997 ozone NAAQS but expressed our desire to “preserve and improve the air quality within our region.” We believe we are meeting those goals.

RAPCA JURISDICTION PROFILE**2010 CENSUS**

Statistical Area	Population	County	Population
Dayton Metropolitan	799,232	Greene	161,573
		Miami	102,506
		Montgomery	535,153
Springfield Metropolitan	138,333	Clark	138,333
Greenville Micropolitan	52,959	Darke	52,959
n/a	n/a	Preble	42,270
TOTAL SA	990,524	TOTAL RAPCA	1,032,794

While in former days the Dayton area was heavily industrialized, a significant amount of our current air pollution problem is due to transport. There are 6 large metropolitan areas within 300 km of Dayton: Detroit, Indianapolis, Louisville, Cincinnati, Columbus and Cleveland. The combined population (2010) of those six Metropolitan Statistical Areas is 13,213,000.

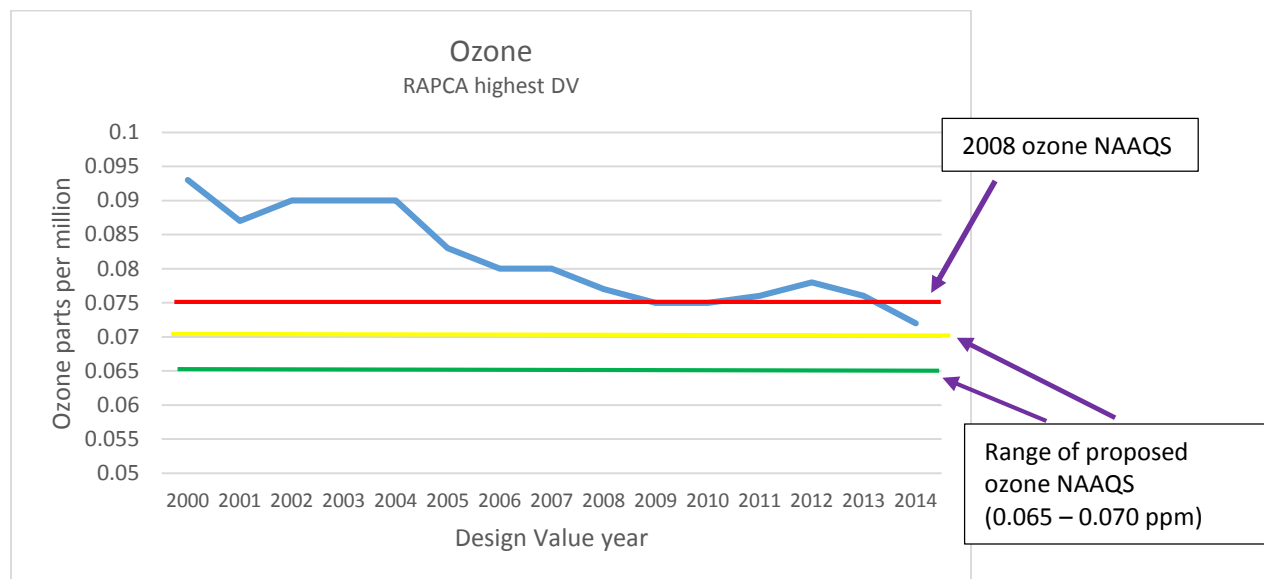
Another significant source of VOC and NOx ozone precursors in our area are mobile sources. Annual vehicle miles traveled in our six counties total over 10 million.

2010 ODOT VMT

County	Annual Vehicle Miles Traveled
Clark	1,625,000
Darke	481,000
Greene	1,597,000
Miami	1,115,000
Montgomery	5,207,000
Preble	543,000
TOTAL RAPCA	10,568,000

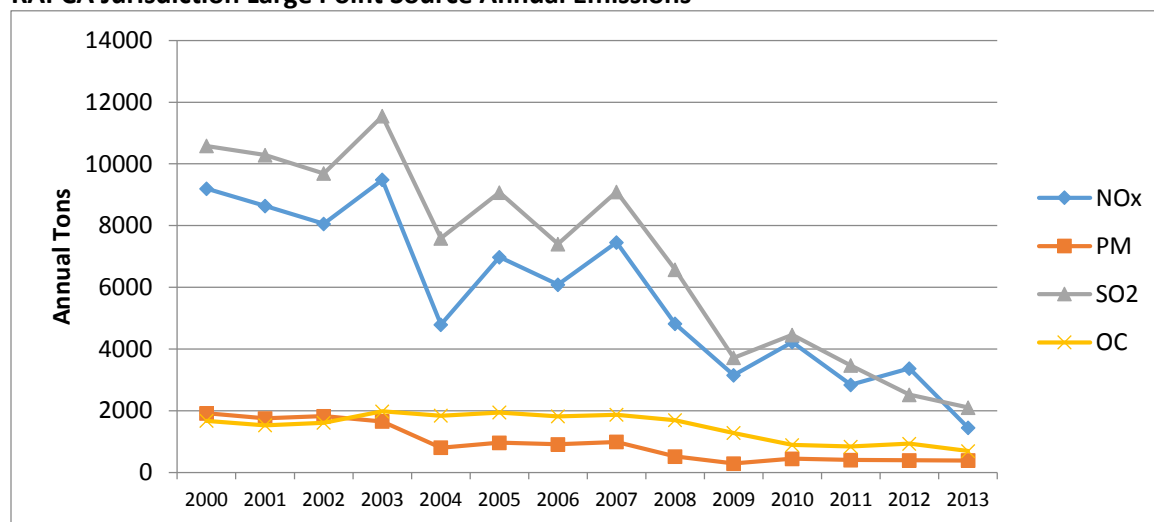
CURRENT AIR QUALITY

Currently RAPCA jurisdiction is in attainment of all NAAQS including the 2008 ozone NAAQS. We monitor ozone at six locations in our area. The highest ozone design value for each year is shown on the following figure and compared to the 2008 ozone NAAQS and the proposed range for the new ozone NAAQS.



While the relatively cool and wet summers of 2013 and 2014 greatly reduced the three-year DVs in RAPCA jurisdiction, it should be noted that even the hot, droughty summer of 2012 only increased the DV marginally when compared to the early 2000's. We attribute overall ozone reductions to regional and national measures such as cleaner cars and trucks and the various transport rules, as well as the reductions in large point source emissions in the Dayton area.

RAPCA Jurisdiction Large Point Source Annual Emissions



RAPCA Ozone-related Activities

On March 12, 2015, RAPCA provided official comments to the EPA docket for the ozone NAAQS proposal. In them, we advocated setting the primary ozone NAAQS at the upper end of the CASAC-recommended range. For more information, the entire comment letter is provided in Attachment 1.

Beyond providing comments on the ozone NAAQS and advocating for timely and stringent national measures, RAPCA has conducted a number of local activities to both reduce emissions of ozone precursors and raise public awareness of ozone pollution.

- In cooperation with the Miami Valley Regional Planning Commission (MVRPC), RAPCA obtained a grant to develop, manufacture, and install anti-idling signage at participating schools in the Dayton area. More information on this program is provided in Attachment 2.
- In cooperation with the Ohio Environmental Education Fund, over twenty clean school bus projects have been funded in RAPCA jurisdiction. To date, nearly one half million dollars has been expended on clean school bus grants in RAPCA jurisdiction. A detailed list of the school districts and the type of project is provided in Attachment 3.
- In cooperation with MVRPC, RAPCA has redirected \$17,000 of its annual Congestion Mitigation/Air Quality (CMAQ) grant to a contractor to enhance and improve the Air Quality Index portions of the RAPCA webpage. This will make air pollution information more accessible and intuitive for the public and stakeholders. More information on this activity is provided in Attachment 4.
- RAPCA participates in the Air Team of the Dayton Regional Green 3 (DRG3) initiative. There is a planned DRG3 “kickoff” meeting on April 20, 2015. More information on this activity is provided in Attachment 5.
- RAPCA forecasts ozone and PM2.5 levels for up to 5 days in advance and publishes the forecasts on AirNow and the RAPCA website. In cooperation with MVRPC, we utilize the forecasts to issue Air Pollution Advisories as needed (AQI forecast > 100). When an APA is issued, the public is alerted to potential health effects and pollution reduction measures. More information on this activity is available at www.miamivalleyair.org.

In summary, RAPCA efforts have reduced ozone levels in the Dayton area, and the reductions are expected to continue. Under the Ozone Advance program, stakeholder groups have informed our efforts to improve and enhance our public outreach programs. In addition we continue to implement local reduction actions such as clean school buses and anti-idling campaigns.



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Public Health
Prevent. Promote. Protect.
Dayton & Montgomery County

March 12, 2015

U.S. Environmental Protection Agency
EPA Docket Center
Mailcode: 28221T
Attention Docket ID No. EPA-HQ-OAR-2008-0699
1200 Pennsylvania Avenue, NW
Washington, DC 20460

To whom it may concern:

On behalf of the Regional Air Pollution Control Agency (RAPCA), thank you for this opportunity to comment on the proposed National Ambient Air Quality Standards (NAAQS) for ozone, published by U.S. EPA on December 17, 2014 (79 Federal Register 75234). RAPCA is a part of Public Health – Dayton & Montgomery County and is the local air pollution control agency serving Clark, Darke, Greene, Miami, Montgomery and Preble counties in Southwest Ohio. RAPCA is directly funded by U.S. EPA to perform ambient air monitoring in our six county jurisdiction and we work closely with Ohio EPA to quality assure and certify our ambient air monitoring data.

The following outlines RAPCA's comments by topic.

PRIMARY and SECONDARY STANDARDS

RAPCA recommends that U.S. EPA propose the primary standard in the range of 68 to 70 ppbv and/or delay design value years to 2015-2017 to take fuller advantage of national ozone reduction measures (e.g. mobile source standards, Transport Rule). Transport of ozone and ozone precursors along with mobile source emissions are principal causes of ozone pollution in the Dayton area and must be addressed as part of any ozone attainment strategy.

Statistical analysis of RAPCA's ozone data supports U.S. EPA's conclusion that the alternative W126 secondary standard is no more protective than the proposed primary standard. Therefore, we support U.S. EPA's current proposal that the secondary and primary standards be the same.

OZONE SEASON

RAPCA supports the extension of Ohio's ozone monitoring season and the earlier effective date of January 1, 2016.

PHOTOCHEMICAL ASSESSMENT MONITORING STATIONS (PAMS)

RAPCA operates a rural NCore site and we may be affected by the various U.S. EPA proposals regarding PAMS implementation at NCore sites.

RAPCA does not support U.S. EPA's first alternative proposal to require PAMS at all NCore sites regardless of ozone attainment status.

RAPCA conditionally supports U.S. EPA's second alternative proposal to require PAMS at NCore sites in ozone nonattainment areas. We recommend that the second alternative be implemented with the Core Based Statistical Area (CBSA) threshold of 1 million people or more.

This additional requirement for a PAMS site would be unduly burdensome for a small agency such as RAPCA that is located in a relatively low population jurisdiction. In addition, Dayton would be surrounded by PAMS operated by other monitoring jurisdictions. We estimate 6 new PAMS sites within a few hundred kilometers under the second alternative proposal with a CBSA threshold of 1 million. We do not believe that the additional data obtained from RAPCA's operation of a PAMS site would justify the additional financial and personnel resources required.

ENHANCED MONITORING PLAN

For similar reasons as those cited above, RAPCA supports a CBSA threshold of 1 million people or more for any Enhanced Monitoring Plan requirements in ozone nonattainment areas.

RAPCA appreciates the opportunity to provide comments and feedback on the proposal. Please direct any questions or comments to me.

Sincerely,



Jennifer Marsee
Bureau Supervisor, RAPCA



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

RECEIVED

JUN 23 2014

REGIONAL AIR
POLLUTION CONTROL

June 19, 2014

Brian Huxtable
Regional Air Pollution Control Agency
117 S. Main Street
Dayton, Ohio 45402

Re: Ohio Environmental Education Fund, Mini Grant Agreement for #S-14M-046

Dear Mr. Huxtable:

Enclosed is a copy of the executed Ohio Environmental Education Fund (OEEF) Grant Agreement between the Ohio EPA and **Regional Air Pollution Control Agency**, along with a copy of the Grant Administration Reference Document (GARD) that includes instructions for submitting the closing fiscal and activity reports. Electronic versions of these forms are also

contained in the GARD posted on the OEEF Program Website at <http://epa.ohio.gov/oeef/EnvironmentalEducation.aspx> under the "Environmental Education" tab. We are preparing a 100% grant payment of **\$4,975.00**, which you should receive within the next several weeks.

A copy of the grant agreement is also enclosed for Jennifer Riley, your designated Fiscal Agent. I would respectfully ask that you both review these documents to be sure you are familiar with the requirements of your grant. Section 8.1 of the grant agreement shows that your closing fiscal and activity reports will be due to our office on **12/21/2015**. (If you complete the entire project before then, you may certainly submit the closing report sooner.) Please contact your grant coordinator Dennis.Clement@epa.ohio.gov or 614-644-2048 with any questions. We look forward to working with you on this project.

Sincerely,

Carolyn Watkins
Chief, Office of Environmental Education
Administrator, Ohio Environmental Education Fund

enclosures

cc: Jennifer Riley, Fiscal Agent

SCANNED

JUN 23 2014

REGIONAL AIR
POLLUTION CONTROL

SUMMARY OF GRANT ADMINISTRATION REFERENCE DOCUMENT

Congratulations on receiving a grant from the Ohio Environmental Education Fund (OEEF)! By applying for and receiving a grant you have become an example of the growing number of Ohio educators, business professionals and other citizens who understand the importance of and need for increased environmental awareness through education.

Throughout the life of your project you will be required to submit activity and fiscal accounting reports, and other documents necessary to meet the conditions of your Grant Agreement. In order to make the reporting process as simple and straight forward as possible we are providing you with guidelines for preparing your reports.

Contained in this Grant Administration Reference Document (GARD) are the following items.

- OEEF Grant Agreement (including obligations; application; budget; and conditions, if applicable)
- Highlights of Grant Agreement Obligations
- Instructions for completing Activity Reports
- Instructions for completing Fiscal Reports
- Payment Information and Formats for Fiscal Reports

Education should be fun and we want you to stay excited about your grant project instead of feeling bogged down with reporting requirements of the grant.

Good luck with your project. Please call, write or visit us whenever you have questions, want to provide us with informational tidbits or to offer us recommendations for improving our programs. We maintain a library of products developed under OEEF grants which you are always welcome to review and copy.

**Ohio EPA - OEEF
P.O. Box 1049
Columbus, Ohio 43216-1049**

**50 W. Town Street, Suite 700
Columbus, Ohio 43215**

**Phone: 614-644-2873
Fax: 614-752-0727
Email: oeef@epa.ohio.gov**

Attachment 3. 2006 – 2014 OEEF Clean Diesel School Bus grants

Beavercreek City Schools, Greene County, \$9,750 to retrofit 13 buses with DOCs. #B2006S-011, This grant is supported with state civil penalties. Contact: gary.sattler@beavercreek.k12.oh.us

Bellbrook-Sugarcreek Schools, Greene County, \$14,184.00 to install DOCs onto 9 buses, #B2012S-020. This grant is supported with state civil penalties. Contact: Beverly Wetzel, bev.wetzel@sugarcreek.k12.oh.us 937-848-6251.

Centerville City Schools, Montgomery County, \$14,448 to retrofit 14 buses with DOCs, #B2011S-018. This grant is supported with state civil penalties. Contact: Chuck Walk, Chuck.Walk@centerville.k12.oh.us or 937-885-7776.

Eaton Community City Schools, Preble County, \$14,448.00 to retrofit 14 buses with diesel oxidation catalysts, #B2011S-026. This grant is supported with state civil penalties. Contact: Karen Jefferson, kjefferson@eaton.k12.oh.us or 937-456-4330.

Greenville City Schools, Darke County, \$63,653 to install diesel oxidation catalysts and anti-idling equipment onto 7 buses, diesel oxidation catalysts onto 6 buses and anti-idling equipment onto an additional 12 buses #B2013F-011. This grant is supported with state civil penalties. Contact: Beth Cain, bcain@greenville.k12.oh.us 937-548-4464.

Huber Heights City Schools, Montgomery County, \$98,152 to install emission controls onto 6 buses and anti-idling equipment onto 40 buses. #B2013S-019. Contact: William Peck, 937-237-6385, William.peck@huberheightscityschools.org

Mad River Local Schools, Montgomery County, \$25,207.00 to install 16 DOCs. #B2012F-006. This grant is supported with federal DERA dollars. Contact: Dan Decerbo, dan.decerbo@madriverschools.org 937-237-4280.

Northmont City Schools, Montgomery County, \$30,180 to retrofit 33 buses with DOCs. #B2006S-002, This grant is supported with state civil penalties. Contact: John Blessing, jblessing@northmontschools.com

Northeastern Local School District, Clark County, \$26,044.00 to install DOCs onto 17 buses, #B2012S-015. This grant is supported with state civil penalties. Contact: Randy Phares, randyphares@nelsd.org 937-328-6562.

Vandalia-Butler City Schools, Montgomery County, two grants totaling \$185,012 to retrofit 23 buses: 7 buses with catalyzed continuously regenerating technology and 18 with DPF/CCF. #B2007S-014 and B2007F-018, These grants are supported with state civil penalties. Contact: Jean.Taylor@vandalia-butler.k12.oh.us

Yellow Springs Exempted Village Schools, Greene County, \$7,181 to retrofit four buses with DPF. #B2006S-003, This grant is supported with state civil penalties. Contact: Susan Butler & Sharon Horne, ys_shorne@mveca.org

Abbreviations:

DOC = Diesel Oxidation Catalysts

DPF = Diesel Particulate Filter

CCF = Closed Crankcase Filter

PH = Preheater anti-idling technology

For more information on Ohio's Clean Diesel School Bus Fund for retrofit grants, contact:

Ohio EPA, Office of Environmental Education

P.O. Box 1049

Columbus, OH 43216-1049

Phone: (614) 644-2873

Email: oeef@epa.state.oh.us

Web: <http://www.epa.ohio.gov/oeef/schoolbus.aspx>

Last update: 4/9/14



January 14, 2015

STI-715002

Brian Huxtable
Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-3280

Re: Proposal for developing and hosting Air Quality Index website components for the Regional Air Pollution Control Agency

Dear Mr. Huxtable,

Sonoma Technology, Inc. (STI) is pleased to submit a proposal for developing and hosting webpage components for the Regional Air Pollution Control Agency's (RAPCA) air quality website. From our prior communications, we understand that the goal of this project is to create interactive, reliable, dynamically generated Air Quality Index (AQI) website displays that automatically update with real-time data. To achieve this goal, we propose to perform the following work.

Website Software Development

STI will

- Work with RAPCA to finalize requirements and maintain communications through the project cycle.
- Develop a current conditions contour map display module for the air quality webpage.
- Develop a Google map display module showing KML point air quality data.
- Develop an interactive graph display tool (including line graphs) showing current and recent ozone and PM_{2.5} AQI levels at RAPCA air quality monitors.
- Conduct a test-and-review cycle to confirm software functionality and performance.

Website Operations and Maintenance

STI will operate and maintain the RAPCA website components and supporting database on STI servers for one year from deployment.

Deliverables and Cost for Website Development, Operations, and Maintenance

The three deliverables for the proposed website development work and their costs are shown in [Table 1](#). These costs include time needed to communicate with RAPCA regarding deliverable design and implementation and time for software testing.



You don't want to miss this!



KICKOFF EVENT & PRESS CONFERENCE

Dayton Regional Green, DP&L and Vectren
invite you to join us

April 20, 2015 | 10:30 a.m.

Cox Arboretum | 6733 Springboro Pike | Dayton, OH 45449

as we recognize the newly green-certified businesses and kick off enrollment for the **Bring Your Green Challenge**. The program will include remarks from elected officials, Dayton Chamber, DP&L and Vectren. Light refreshments will be provided.

The **Bring Your Green Challenge** is a friendly year-long competition built around sustainability practices and increasing your bottom line.

ARE YOU GAME?