

State of the Air Report

Presentation to BIA/DES Regulatory Conference

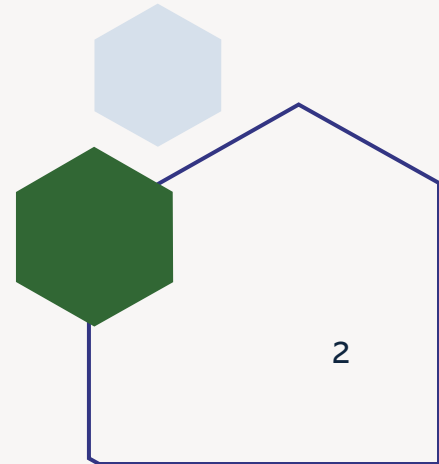
Craig A. Wright, Director

September 10, 2024



Summary of Topics

- Status of Air Quality in NH
- ARD Bureaus Updates
- Federal and Rule Updates
- Challenges



NHDES Air Resources Division

Director: Craig A. Wright (603) 271-0882

Asst Director: Mike Fitzgerald (603) 271-6390

Permitting and Environmental Health Bureau

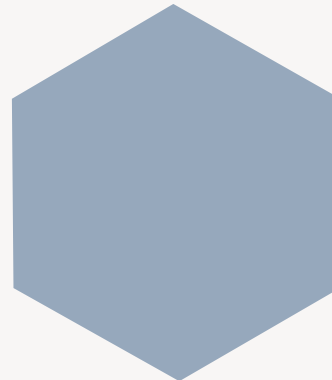
Gary Milbury (603) 271-2630

Compliance Bureau

Sheri Eldridge (603) 271-0882

Technical Services Bureau

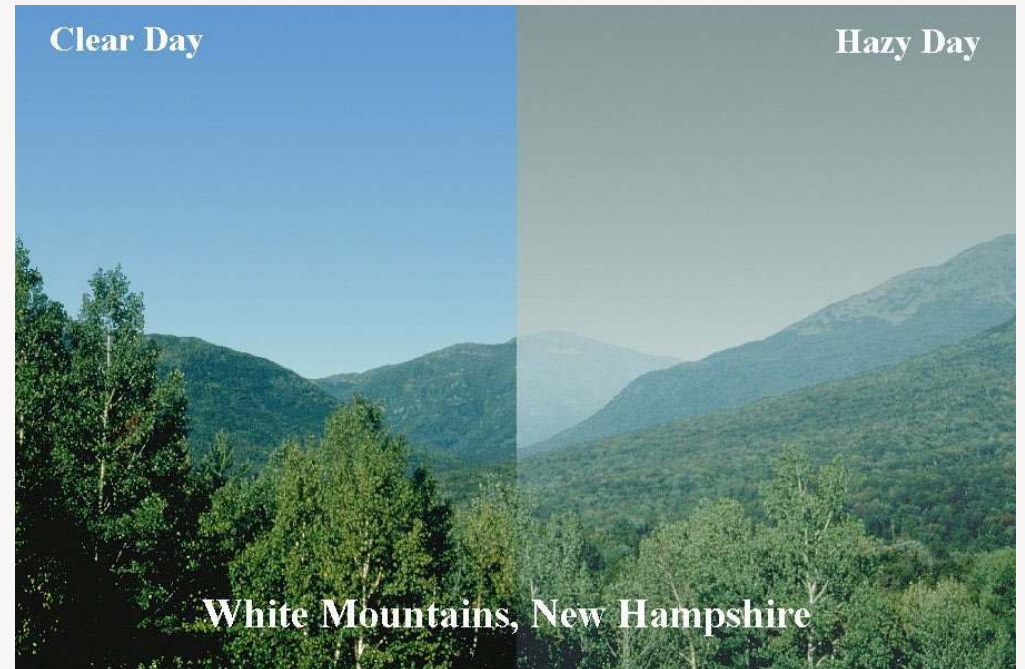
Jessica Wilcox (603) 271-6749



Air Quality Issues in NH

- Ozone
 - Summertime issue often associated with air transported into the region
 - Historically our largest regulatory challenge
- Fine Particulate Matter
 - Used to be primarily wintertime woodsmoke issue
 - We are now seeing summertime wildfire events
 - Nature of problem makes it very challenging
- Regional Haze
 - Visibility in our Class 1 Areas
- Climate
 - Extreme weather events
 - Ecological impacts to our natural environment

Regional Haze

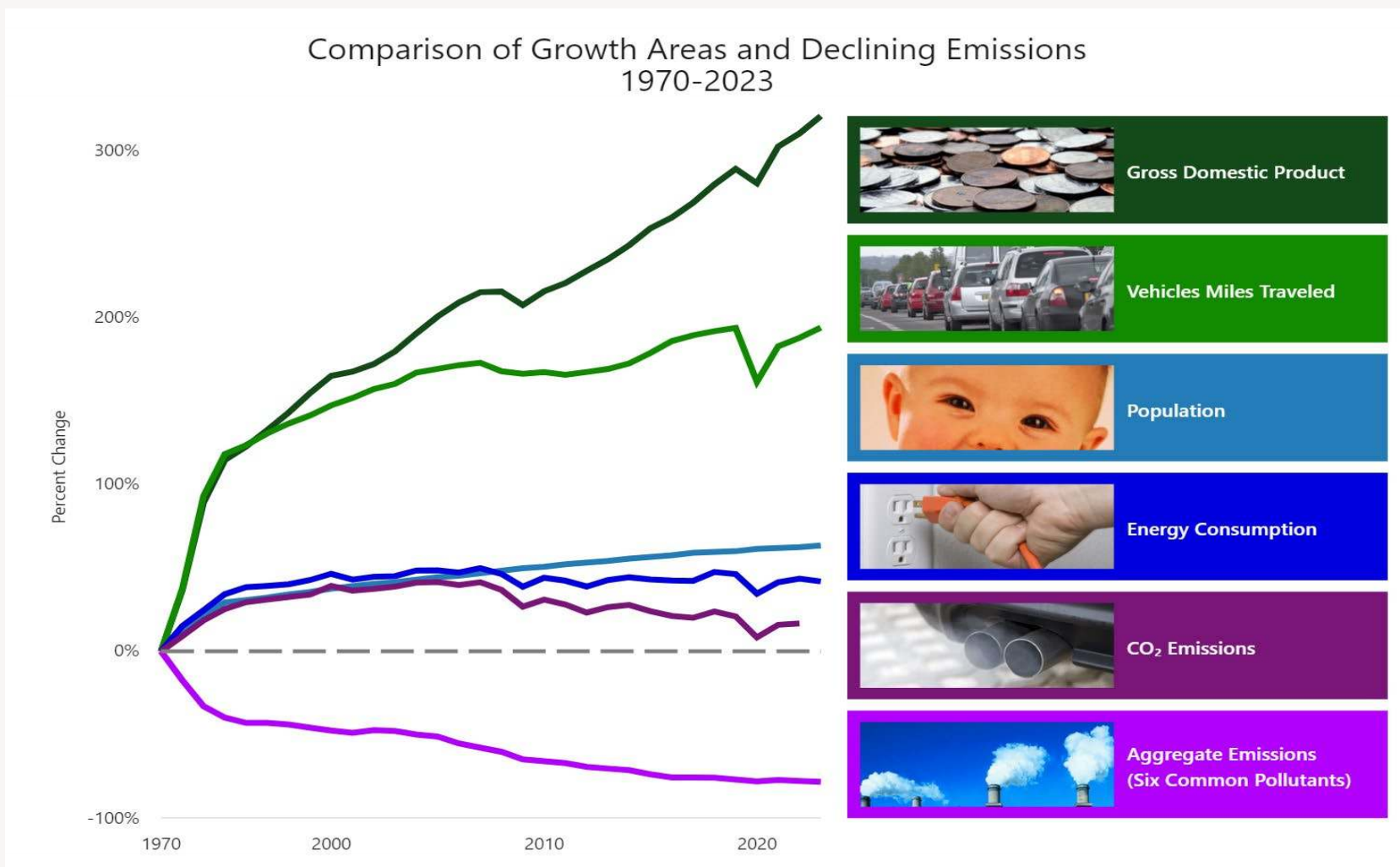


Status of Air Quality in NH

On most days
NH's air quality is
Good!

Long-term trend
of improving air
quality in NH

Nationally,
according to EPA
we have seen a
78% decrease in 6
common air
pollutants since
1970



PEHB - Air Permitting Program

State and Federal Permitting Programs

805 Permitted Facilities in NH

- 28 Title V Sources (Federal Permit Program – “Major” Sources)
- 777 State Sources including:
 - 264 Temporary Permit and State Operating Permit Sources
 - 422 General State Permit Sources (Emergency Generators) – *online process*
 - 91 Permit-by-Notification Sources (Rock Crushing Operations) – *online process*
- **SB 449 Requirements**
 - DES requested this bill to address statutory conflicts between RSA 125-C and RSA 541-A:29
 - This bill establishes permit issuance timeline for state permits and does not impact federal permits
 - Allows DES to seek extensions from applicants



PEHB - Environmental Health Program

- **Increased Staffing and Technical Support Capabilities**
 - In April 2023 we received a new 5-year grant for funding from the Agency for Toxic Substances and Disease Registry (ATSDR) to continue supporting communities with environmental exposure concerns.
 - Have added a new health educator position for the program.
 - Health Risk Assessor and Toxicologist positions (SB 309) recently became vacant and we are currently recruiting to back-fill these positions to continue to support PFAS standards and risk assessment
 - Developing education tools for local community leaders related to contamination, cancer investigations and partnering with state agencies



Compliance Bureau

State and Delegated Federal Programs

- Compliance Inspections and Compliance Assistance FFY 2023
statistics
 - Conducted 48 inspections at stationary sources
 - Received 140 air quality complaints (including asbestos)
- Stack Testing and Emission Monitoring
 - Conducted oversight of third-party stack testing companies at 43 sites
 - Quality control checks on 15 continuous emission monitoring systems to ensure data accuracy
- Enforcement
 - Successfully completed 116 enforcement actions without any federal over-filing



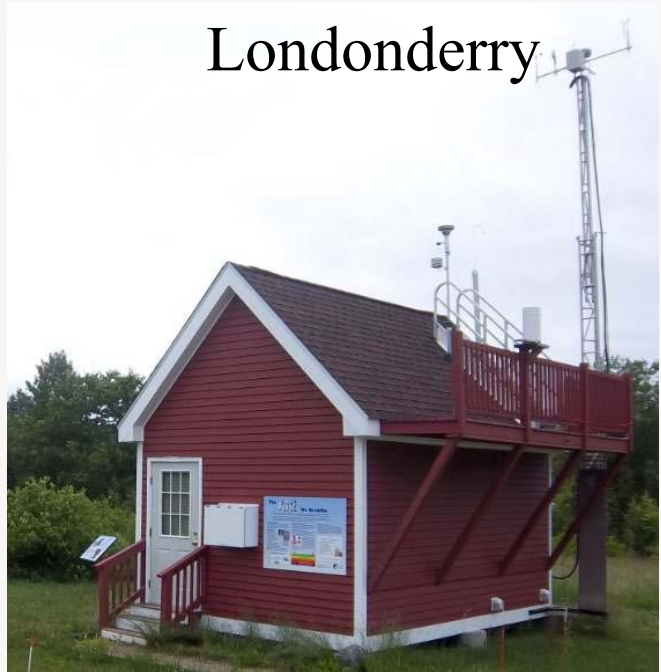
Compliance Bureau

State and Delegated Federal Programs

- Asbestos Management
 - Federal grant awarded to conduct 30 inspections per year at NH schools to ensure proper management of asbestos
 - Received over 1800 NESHAP notifications for asbestos removal projects and over 1400 license/certification applications
 - Conducted 36 NESHAP compliance inspections in FFY23 – we expect that to significantly increase now that we are fully staffed



Technical Services Bureau – Air Monitoring



Upcoming Planned Changes to Network

Adding PM 2.5 site to Northern NH

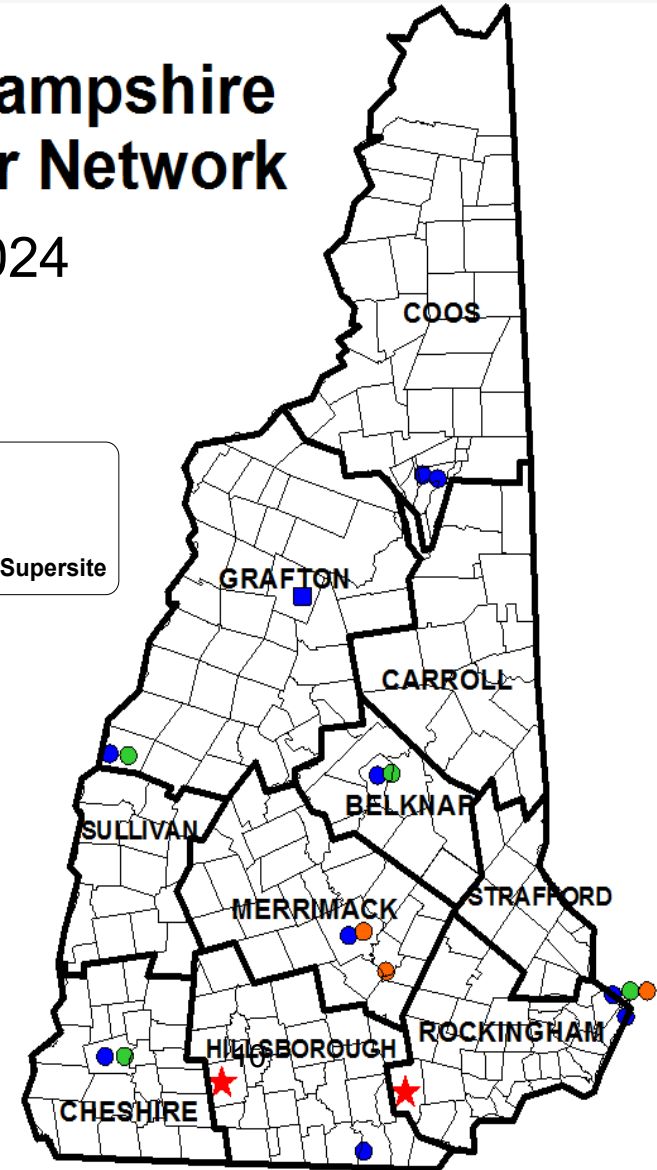
Relocating Laconia Site – Ozone and PM

Adding Trace CO to Mt. Washington

New Hampshire Monitor Network

2024

- Ozone
- PM2.5
- SO2
- ★ NCore Supersite



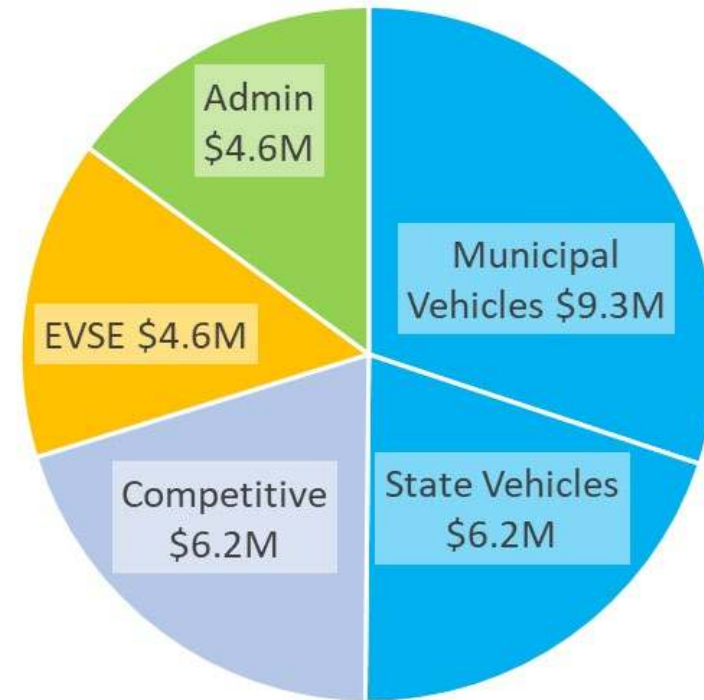
TSB - Mobile Source Programs

- Annual Motor Vehicle Inspections (OBD)
- Grant programs (DERA and VW)
- Granite State Clean Cities Coalition
- Education/Outreach
- Transportation Planning/
Regional Planning
Commissions



NH Volkswagen Mitigation Trust Allocations

- NH was allocated \$30.9M in October 2017, held in a Trust
- NHDES became the lead agency for the VW Trust funds in August 2021
- NH Beneficiary Mitigation Plan:
 - Approx \$15.5M for replacing government diesel vehicles and equipment (including through DERA)
 - Approx \$6.2M for competitive projects to replace diesel vehicles/equipment (i.e. DERA)
 - Approx \$4.6M for installing EVSE
 - Up to \$4.6M for administrative costs
- Learn more at:
<https://www.des.nh.gov/business-and-community/loans-and-grants/volkswagen-mitigation-trust>



Challenges 2024 and Beyond

Transitioning to a future workforce

- Currently have 11 vacant positions (16% of our staff)
- 3 senior staff retirements this year
- Expect another 6-8 senior staff retirements this year

Transportation remains the largest source of emissions in NH and the US

Ozone transport = historically has been biggest impact to NH

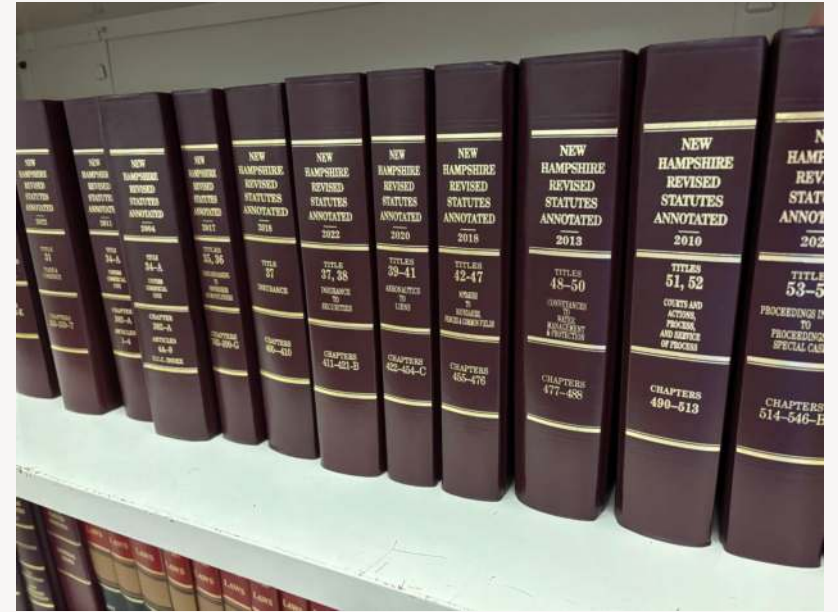
Summertime wildfire smoke events – a new normal?

Continue to support a transition to cleaner energy

Expectation and demands on staff are incredibly high from all directions

ARD Rulemaking Plans

- Air Permitting Rules – Env-A 600
 - Implemented under RSA 125-C and Federal Clean Air Act
 - Last significant update was in 2014
 - Plan to do housekeeping and modernize the rules – electronic submittals, new permit issuance timelines, better coordinate our rules with federal EPA guidance for air permit programs
- Air Permitting Fees – Env-A 700
 - Implemented under RSA 125-C and Federal Clean Air Act
 - Last significant update was in 2018
 - Emission-base fee rate has been held level since 2020
- PFAS Air Emissions
 - Statute authorizes ARD to adopt rules regarding deposition and potential impacts to groundwater and determination of BACT



New Federal Rules

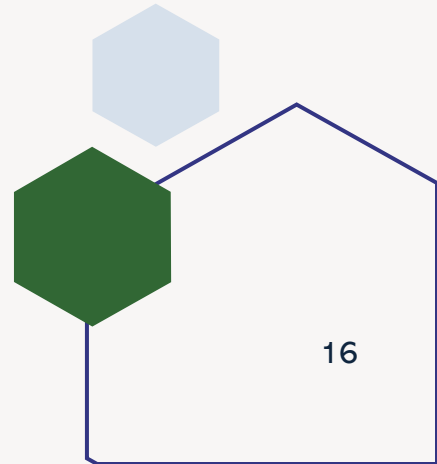
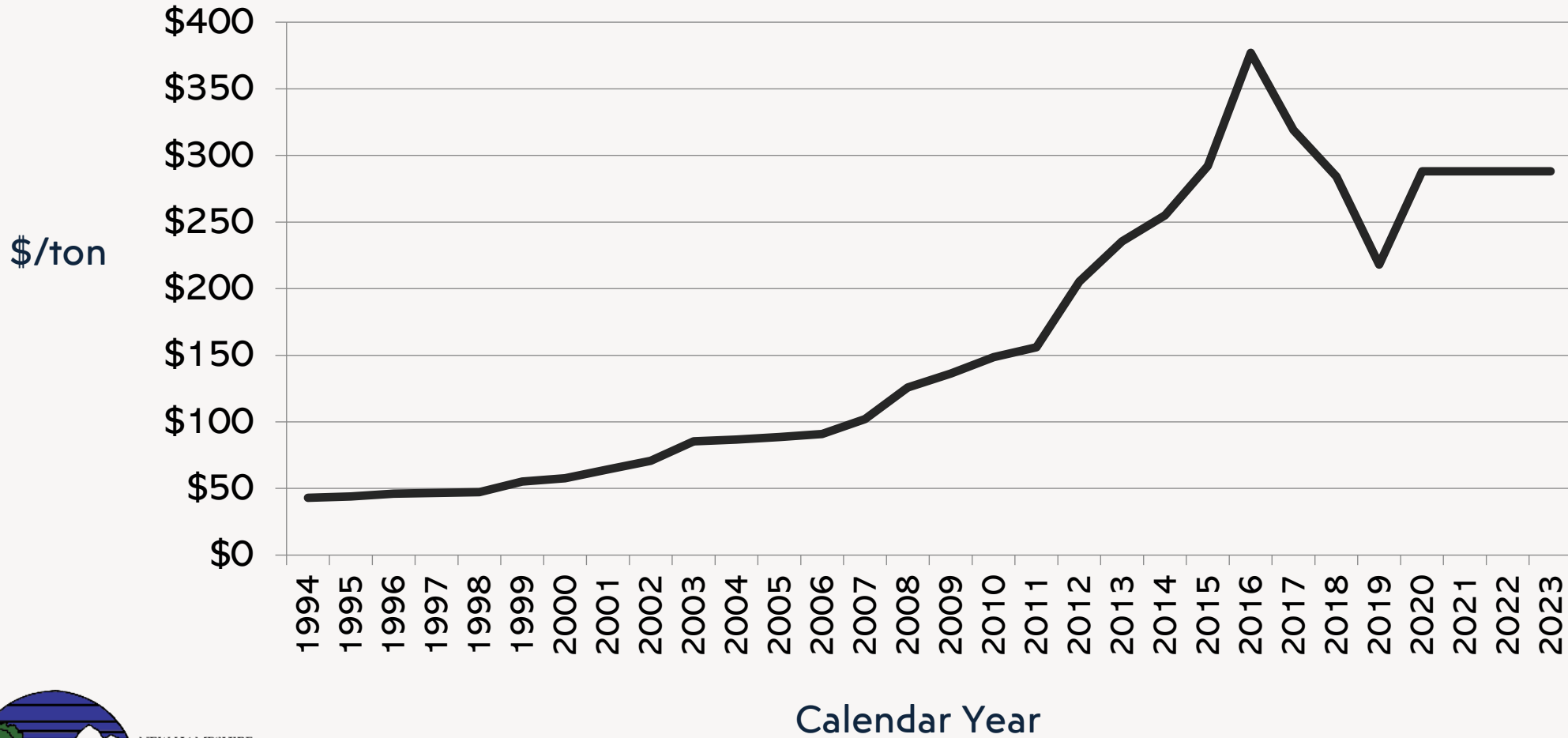
Proposed or Final Federal Emission Guidelines:

- Methane from Oil/Natural Gas Sector
- GHG emissions from Existing Fossil Fired EGUs
- Large MWCs
 - NH has a hand full of sources subject to these new standards
 - All are under court litigation
 - Pending court litigation on all of these EPA actions

Pending New Federal Emission Guidelines:

- GHG emissions from Existing Gas Turbines
 - NH will likely have several sources subject to this standard

Status of Air Permit Fees





Thank you

Craig A. Wright

Craig.a.wright@des.nh.gov

(603) 271-1088