

MEMORANDUM OF AGREEMENT
Between the
United States Environmental Protection Agency
and the
Washington State Department of Ecology
and the
Spokane Regional Transportation Council
and the
Spokane County Air Pollution Control Authority

Relating to
Respective Roles & Responsibilities
Concerning Attainment of the Carbon Monoxide Standard
in Spokane County, Washington

This Memorandum of Agreement (MOA) is made and entered into by and between the United States Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), the Spokane Regional Transportation Council (SRTC), and the Spokane County Air Pollution Control Authority (SCAPCA). This MOA is created in response to the agencies' recognition of the need to protect public health from carbon monoxide (CO) levels which may exceed the National Ambient Air Quality Standards (NAAQS) in Spokane County of the State of Washington.

PURPOSE

The purposes of this MOA are, (1) to provide the opportunity for Ecology, SRTC, and SCAPCA to develop information to support EPA's determination whether to reclassify as "serious", the Spokane CO nonattainment area (NAA), and (2) to take proactive steps directed toward attainment and ultimate maintenance of the CO NAAQS, and (3) to prevent future exceedance of the NAAQS. To accomplish these purposes, the MOA outlines a systematic approach for characterizing the causes of potential exceedance of the CO NAAQS, with special emphasis on the Central Business District (CBD), but also addressing issues which impact the CO NAA as a whole. The MOA clarifies the roles and responsibilities of EPA Region 10, Ecology, SRTC, and SCAPCA in carrying out the activities resulting from this MOA, provides for coordination between the four agencies, and provides for involvement of other interested parties.

BACKGROUND

A portion of Spokane County (including part of the City of Spokane) was classified as a moderate NAA for CO, by operation of law, under the Clean Air Act Amendments of 1990 (CAAA). Section 186(a)(1) of the CAAA required moderate NAAs to attain the CO NAAQS

1. provide Section 105 grant funds toward this effort, as specified in existing agreements between EPA and Ecology;
2. review and provide comment on work products as detailed in the section on tasks; and
3. confer with Ecology, SRTC, and SCAPCA on the proposed classification of the CO NAA, in light of the work products.

Ecology will:

1. provide technical assistance to SRTC and to SCAPCA;
2. provide Section 105 and state Air Pollution Control Account grant funds to SCAPCA, as specified in existing agreements;
3. review and provide comment on work products as detailed in the section on tasks;
4. continue operation of the existing CO air monitoring network;
5. take the lead in completing Task 3 (New CO Monitoring Site), as outlined below; and
6. provide monitoring equipment and coordinate with SCAPCA on Task 1 (Air Quality Saturation Study), as outlined below.

SRTC will:

1. take the lead in completing Tasks 6 (Traffic Origin and Destination Study) and 8 (Traffic Patterns and Emissions), as outlined below; and
2. share the lead with SCAPCA in completing Task 7 (Technical Advisory Committee), as outlined below.

SCAPCA will:

1. with the assistance of Ecology and SRTC, take the lead in completing
Task 1 (Air Quality Saturation Study)
Task 2 (Microinventory and Tracer Gas Study)
Task 4 (Voluntary Commute Trip Reduction)
and Task 5 (Public Awareness Campaign), as outlined below; and
2. share the lead with SRTC in completing Task 7 (Technical Advisory Committee), as outlined below.

TASKS

In order to better understand the variables, in addition to motor vehicle traffic, which contribute to elevated levels of CO within the CBD, SCAPCA will perform a microinventory of CO sources which may have not been adequately characterized in the past. For example, there are numerous large commercial and industrial boilers in the area which may contribute to localized high CO concentrations. In conjunction with the microinventory, SCAPCA will contract for the release of dual tracer gases and subsequent capture and analysis at various locations within the CBD, taking note of wind direction and other meteorological variables. This information is expected to shed light on the causes of localized high CO concentrations.

Milestones and Timeline

The microinventory and tracer gas study will be completed according to the following milestones and timeline.

1. Dual tracer gas study contract with Washington State University and Montana Tech.
Contract Award Date: 12/31/96
Dual Tracer Gas Study Dates: 01/02/97 - 02/15/97
Report of Findings: 03/31/97
2. Microinventory.
Define the area and source types to be inventoried: 01/15/97
Define the information to be collected: 01/15/97
Perform the microinventory: 01/15/97 - 02/28/97
Reconcile with the emissions inventory in the SIP: 03/15/97
Report of Findings: 03/31/97

Task 3. Establish a New CO Monitoring Site near/at 3rd & Washington

The owner of the property, leased to Ecology for the 3rd & Washington monitor, decided not to renew the lease, and the SPM monitor was removed from the site. Since the location was where the most recent exceedances of the CO NAAQS were registered, there is a question as to how to monitor attainment of the standard in the future. The best solution would be to establish a new monitoring site as close to the old site as possible, in an effort to register the same microscale street canyon effects as was done with the previous site. To compare the new site with the previous site, a second probe should be placed in as close proximity as possible to the location of the previous probe.

Milestones and Timeline

The location and operation of new CO monitors will be accomplished by Ecology, according to the following milestones and timeline.

1. Commence monitoring at the new site. 11/06/96

1. Establish a partnership of government, transportation, and business interests to function as a steering committee to oversee the campaign. 07/01/96
2. Contract for professional public relations services to develop and implement the campaign. 08/01/96
3. Implement a campaign for the winter of 1996-97. 11/01/96
4. Evaluate the effectiveness of the campaign through established indicators of campaign success. 04/01/97
5. Prepare a final campaign report. 04/15/97

Task 6. Complete and Evaluate the Traffic Origin and Destination Study

In 1996, SRTC utilized Section 103 funds to conduct a traffic origin and destination study in the Spokane area. The purposes of the study were to:

- determine the volume of traffic entering and leaving the NAA;
- establish the origin and destination of the commuters surveyed; and
- determine if the nonattainment boundaries and control programs adequately "capture" a significant majority of vehicle trips.

Milestones and Timeline

The information previously collected will be evaluated by SRTC, according to the following milestones and timeline.

1. Prepare a final report on the information already collected. 12/15/96
2. Determine if the nonattainment boundaries and control programs adequately "captured" a significant majority of vehicle trips. 01/31/97
3. If nonattainment boundaries and control programs do not capture a significant majority of vehicle trips, develop recommendations on how to increase the percentage of captured trips. 02/28/97

Task 7. Establish a Technical Advisory Committee (TAC) to Evaluate TCMs

In 1994, SRTC contracted with Sierra Research to evaluate candidate TCMs for the Spokane CO nonattainment area. The work was completed and compiled into a report, dated May 1995. One or more TCMs may be required as control measures for a serious area implementation plan (if necessary) or for a maintenance plan, leading to a request for redesignation to attainment. A local TAC is needed to determine which TCM(s) is potentially

reductions in CO emissions. The agencies will confer on this information before decisions are made. The process will commence with sharing the information gained among the four agencies. The lead agency for each of the 8 Tasks will provide results to each of the other agencies as soon as a report on the task is available, but no later than June 30, 1997.

GENERAL RESOLUTION OF DISPUTES

The agencies recognize the value of resolving disputes as expeditiously as possible. Disputes arising from the implementation of this MOA will be resolved at the lowest level possible, using standard agency chains of command.

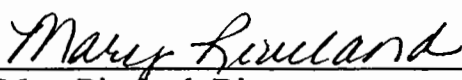
EFFECTIVE DATE, MODIFICATION, AND TERMINATION

This MOA shall be effective upon signature by all four parties, may be amended by mutual consent, and may be terminated by any party after giving thirty days written notice to each of the other three parties. This MOA shall expire on July 30, 1997, or on the effective date of a final rule (or other final action) addressing EPA's proposed reclassification of the Spokane CO NAA to "serious", whichever is sooner, unless this MOA is amended by the agencies or superseded by a new MOA. The agencies will meet to discuss the results and implications of the work completed under the 9 tasks and to identify further information needs, by no later than July 30, 1997.




Chuck Clarke, Regional Administrator - EPA Region 10

11/8/97
Date



Mary Riveland, Director
Washington State Department of Ecology

12/20/96
Date



Glenn Miles, Transportation Manager
Spokane Regional Transportation Council

12/12/96
Date



Eric Skelton, Director
Spokane County Air Pollution Control Authority

12/5/96
Date