

CONTRACT YEAR OCTOBER 1, 2023 TO SEPTEMBER 30, 2024 SUMMARY REPORT

November 2024

Air Quality Program

GENERAL INFORMATION:

Prepared for: South Dakota Department of Agriculture and Natural Resources and the Rapid City Area Air Quality Board

Report by: Morgan Twombly

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GENERAL COMMENTS:

The purpose of this report is to provide information to the South Dakota Department of Agriculture and Natural Resources and the Rapid City Area Air Quality Board regarding the activities completed by the Rapid City Air Quality staff for the contract period of October 1, 2023 through September 30, 2024. The elements of the “Pass Through Agreement” (Twelve bulleted items in I. 1.) are identified below along with the tasks completed or in progress by the Air Quality staff (*shown in italics*).

Summary of “Pass Through Agreement” Elements:

- 1. Program administration:** The City shall prepare minutes and agendas for the Rapid City Area Air Quality Board (Air Quality Board) meetings, correspondence, forms and reports; and maintain a complete filing system of the above documents. Agendas and minutes of meetings shall be made available to the State through the program’s website in a timely manner. The Air Quality Board minutes and activity reports will be provided to the Air Quality Board representatives for the Rapid City Council, Pennington County Commission and made available to the public in the office and through the program's website.

The Air Quality staff prepared and maintained all necessary documents for the Air Quality program. Agendas and minutes were maintained on the website. All documents are available by request from the public in the Air Quality Office and several documents are maintained on the City website.

- 2. Scheduled Site Inspections for Facilities with Compliance Plans:** A baseline time table for scheduled inspections shall be established for the grant year. Formal inspections shall be conducted yearly on all sources with compliance plans. Formal inspection reports, follow-up inspections and complaint inspections shall be documented, maintained for three years and made available for review by the State.

Air Quality staff inspected the Rapid City Street Department, the City Utility Maintenance Facility, Rapid City Landfill, Pennington County Highway Department, J Scull Construction, Rapid City, Pierre & Eastern Railroad,

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Countryside South Road District, Heavy Constructors, Inc, RCS Storage, Butler Machinery, DMI, Iron Horse Excavating, Black Hills Speedway and Nielsen Dirtworks. Formal inspection reports, follow-up inspections and complaint inspections are documented and filed in the Air Quality office.

- 3. Compliance Plan Reviews:** Compliance plan reviews shall be conducted according to the Pennington County Air Quality Ordinance Number 12 and Rapid City Air Quality Ordinance for those operations within the Air Quality Control Zone regulated by the City and the County. The reviews shall be documented, maintained for three years, and made available for review by the State.

Compliance plan permits must be renewed every three years. Four compliance plan permits expired and were renewed during the contract year. One new compliance plan was issued. One compliance plan was not renewed as the property no longer fits the criteria for a compliance plan. All compliance plans are documented and filed in the Air Quality office.

- 4. Construction Permits:** Construction permits will be issued by the City for those operations regulated by the City and the County for projects within the Air Quality Control Zone. Each project will be monitored at least once to ensure requirements are met and on a complaint basis. Permits, inspections and enforcement actions shall be documented, maintained for three years, and made available for review by the State.

A total of 37 new construction permits were issued during this contract year. Air Quality staff conducts inspections on an approximately weekly basis during active construction and less frequently when fugitive dust generating activities have decreased. A total of 105 inspections were conducted during the contract year. Inspections are also conducted when a complaint is received, and a total of 2 complaints were submitted during the contract year. All permit and inspection information is documented and made available to the State for review.

- 5. Public Information, Education, and Assistance:** The City will provide public information relative to air quality in Pennington County and Rapid City when requested. This will include promoting pollution prevention through education and encouraging individual and corporate measures that have or would improve air quality, and continuing to respond to requests for information received from the public. The City will establish and maintain an air quality website to provide access to air quality permit applications and public information on the air quality of the City and County.

The Air Quality staff maintains and updates the air quality webpages as part of the City's website during the contract year. There are several pages that can be reviewed by the public that discuss various aspects of the air quality in Rapid City

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and Pennington County. Staff has also participated in the execution of the EPA Climate Pollution Reduction Grant, in which public outreach for input as well as education of the public has been a focal point. Air Quality staff have been a part of Task Force Meetings with various stakeholders as well as tabled at public events such as Coffee with Planners to discuss the needs of the community as well as educate on individual and corporate roles in Air Quality and Pollution control.

- 6. Coordination of EPA/State/Local efforts:** The City will monitor new developments and any proposed changes in State and Federal regulations that would affect the local program and participate in the review process involved in such changes.

The Air Quality staff monitors new developments on an ongoing basis. The Air Quality Board has been kept apprised of the effects of the new EPA air quality standards. The Air Quality Board provides comments on proposed regulations as they occur.

- 7. Training:** The City staff will attend workshops and training sessions to stay current with new developments provided funds are available. Compliance, enforcement and technical areas are preferred. Staff shall maintain certification for Visual Emission Evaluations (EPA Method 9).

Air Quality staff have obtained EPA Method 9 certification. Staff also attended a conference by the EPA in Minneapolis this year to interface with stakeholders and other municipalities to learn from one another about innovative ways to improve air quality within the jurisdiction.

- 8. Complaint Reporting:** All complaints shall be documented, maintained for three years, and made available for review by the State. All complaints pertaining to State-regulated sources shall be forwarded to the State no later than 5 working days from receipt of complaint, except for extraordinary circumstances. Complaint reporting shall include the name of the complainant (if known), complainant phone number (if provided), name of the source (if known), date of complaint, a description of the complaint and the action taken on the complaint.

The Air Quality staff collects information related to air quality complaints. The complaints are either investigated by staff or forwarded to the State or another appropriate agency or resource. Complaints are available for the State to review on the City website. Two formal complaints were logged: one smoke and one construction. An inspection of the homeowners stove and discussion with building services and the fire department resulted in the closing of the smoke code case. The construction case remains open to continue to enforce compliance.

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- 9. Wood Burning and Dust Control Public Service Announcements:** As part of the program's educational efforts to reduce PM10 pollution from wood burning devices and construction-generated dust, the City will promote the public service announcements videos on wood burning issues and dust control. The City will ensure that these public service announcements are given to the local media for airing during the appropriate season.

The wood burning public service announcement and the dust public service announcement focusing on the reduction of construction dust are available on the City of Rapid City website and Rapid City YouTube Channel. The Air Quality department is working with the Fire Department to improve smoke PSAs.

- 10. Paved and Unpaved Streets and Roads:** The City shall continue to permit, inspect and enforce the Ordinance for the paved and unpaved streets and roads in areas regulated by the City and the County within the Air Quality Control Zone. The City shall develop and maintain an inventory for paved and streets and roads in the area regulated under the Pennington County Ordinance Number 12 and the Rapid City Air Quality Ordinance.

Pennington County provides an updated inventory of the County roads located in the Air Quality Control Zone in the Compliance Plan Permit submittals every three years. An inventory of the unpaved roads in the City is maintained. The data for the inventory of the paved and unpaved roads within the Air Quality Control Zone is updated periodically.

- 11. Unpaved Parking Areas:** The City shall continue to permit, inspect and enforce the Ordinance for the unpaved parking and/or storage areas in areas regulated by the City and the County within the Air Quality Control Zone. The City shall develop and maintain an inventory for unpaved parking and storage areas in the area regulated under the Pennington County Ordinance Number 12 and the Rapid City Air Quality Ordinance.

The inventory of parking and storage areas regulated by Pennington County Ordinance Number 12 and the Rapid City Air Quality Ordinance are maintained in the Central Square TrakIt Software. During the contract period, twenty permits were issued for an unpaved parking and/or storage lot.

- 12. Air Quality Alerts:** The City and Air Quality Board will continue to assist the State in the implementation of the high wind dust alerts. The City shall, in cooperation with the State and when necessary with the National Weather Service, issue the air quality alerts in accordance with established protocol.

The Rapid City Natural Events Action Plan (NEAP) published in July 2005 specifies the procedures followed during high wind dust alerts. The National

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Weather Service issues the alert by listing it on their website and notifies the Department of Agriculture and Natural Resources' Rapid City and Pierre offices and the Rapid City Air Quality staff via email. The Department of Agriculture and Natural Resources notifies the State regulated facilities and the Rapid City Air Quality staff by e-mail and posts the alert on the Department of Agriculture and Natural Resources' website. The Rapid City Air Quality staff writes a public announcement for each air quality alert that is sent out to the media, advising sensitive populations to remain indoors whenever possible and minimize activity. The PSA There were ten high wind dust alerts called during the contract year.