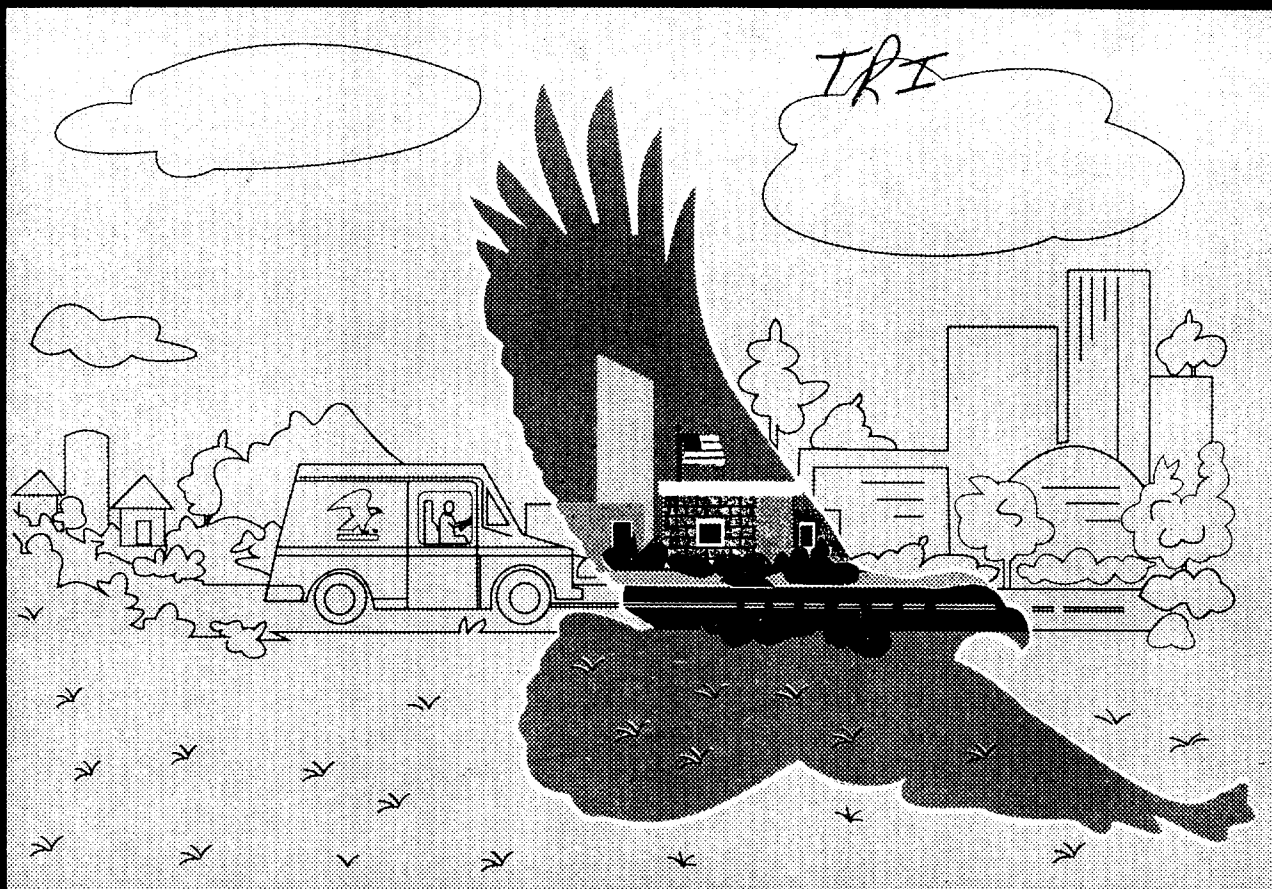




# United States Postal Service



## Clean Air Act Compliance



**A. Explanation.**

1. **USPS Commitment.** The Postal Service is committed to a nationwide environmental protection policy and to compliance with federal, state, and local environmental regulations. A major component of this policy is compliance with the Clean Air Act and its amendments and with the standards set by state and local air quality control agencies. The clean air program will be developed and implemented in phases, and proper training will be provided before implementation.

2. **Contents.** This handbook provides guidance on complying with local and regional air quality regulations that specifically address the Clean Air Act Amendments of 1990. Because compliance plans will vary by locality, only general guidance is presented. Resources within and outside the Postal Service are presented to provide additional assistance. The handbook addresses postal operations (including vehicle fleets), facilities, and human resources. A general approach for achieving compliance and managing inspections is also presented.

3. **Revisions.** This handbook will be revised to modify air quality control policies and strategies as needed to reflect new legislation and regulations.

**B. Distribution.**

1. **Initial.** This document is being distributed to all Headquarters offices, the regional environmental steering committees, and field general managers/postmasters.

2. **Additional Copies.** Organizations not included in the initial distribution or those requiring additional copies should order copies from their material distribution center (MDC) using Form 7380, *MDC Supply Requisition*.

C. **Comments and Questions.** If you need further clarification of the policies and procedures outlined in this handbook, send your request to:

GENERAL MANAGER  
ENVIRONMENTAL MANAGEMENT DIVISION  
UNITED STATES POSTAL SERVICE  
475 L'ENFANT PLAZA SW, RM 4130  
WASHINGTON DC 20260-6423

D. **Effective Date.** These instructions are effective immediately.

*Mitchell H. Gordon*

Mitchell H. Gordon  
Senior Assistant Postmaster General  
Administrative Services Group



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CONTAINS  
SOYOIL™





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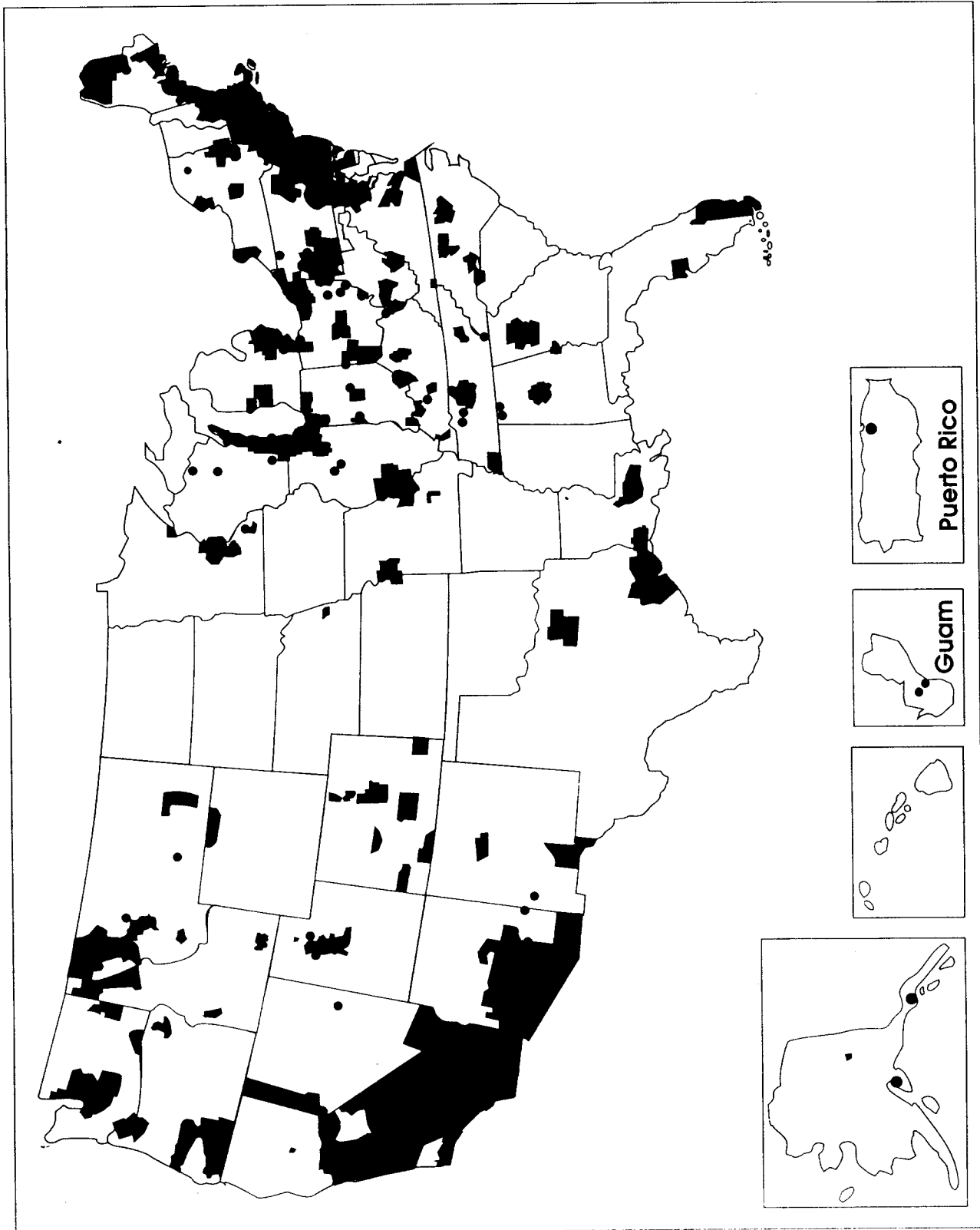
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Nonattainment Areas of the United States

## Chapter 1 Introduction

### 110 General

#### 111 Introduction

##### 111.1 How to Use This Handbook

**.11 Purpose.** This handbook provides guidance on complying with local and regional air quality regulations that address the Clean Air Act Amendments of 1990 (hereafter, the Amendments) (42 U.S.C. Section 7401 *et seq.*). It targets the members of the five regional environmental steering committees and the field division general manager/postmasters, who have primary responsibility for ensuring compliance with the Amendments, and the division environmental coordinators (DECs), who are responsible for source registration, permit requirements, emissions testing, and the development of air pollution compliance plans. Because compliance plans will vary by locality, only general guidance can be presented. The handbook presents resources within and outside the Postal Service that are available to provide additional assistance.

**.12 Organization.** This document is divided into chapters corresponding to the affected functional areas—postal operations (Chapter 2), facilities (Chapter 3), and human resources (Chapter 4). Each chapter explores the range of impacts on these areas and provides guidance for addressing issues within these areas with respect to local compliance plans. Chapter 5 provides a general approach for achieving compliance and managing inspections. The appendices at the end of this document provide additional background information—specifically, definitions of clean air issues; details of the Amendments that may affect the Postal Service; federal, state, and local agencies and contacts; official postal documents; and the Postal Service experience in southern California.

##### 111.2 Background

**.21 History.** The original Clean Air Act was signed into law in 1955 and replaced by the Air Quality Act of 1967, which was considered the first modern environmental law. However, it was the Clean Air Act of 1970, reviewed and amended by Congress in 1977, that formed the basis of a federal air pollution control program, which is administered by the Environmental Protection Agency (EPA). Health-based national ambient air quality standards formed the basis of the clean air program. Because most air pollution comes from either stationary sources (such as boilers) or mobile sources (such as cars and trucks), standards were to be met through the application of control technology that would reduce emissions, resulting in improved air quality. All requirements were to be national, with no entity having a competitive edge by locating in areas with less stringent controls. The Clean Air Act of 1970 prescribed stringent automotive standards, mandated new technology for stationary sources, and established the National Ambient Air Quality Standards (NAAQS), which specify maximum acceptable levels of pollutants for outdoor air to protect human health. The Clean Air Act Amendments of 1977 built upon

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***Because compliance plans will vary by locality, only general guidance is presented. This handbook presents available resources within and outside the Postal Service for additional assistance.***

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***The Amendments were signed into law on November 15, 1990, and the law's many far-reaching provisions aimed at improving air quality may significantly alter the way the Postal Service conducts its operations.***

the 1970 act by adding new stationary source performance standards and a prevention of significant deterioration provision, establishing nonattainment area requirements (areas where the NAAQS were being exceeded), and tightening automotive emission standards.

**.22 The Amendments.** The Amendments were signed into law on November 15, 1990. With the many far-reaching provisions aimed at improving air quality, this law has the potential to significantly alter the way the Postal Service conducts its operations. The Postal Service operates a fleet of 179,000 vehicles, including light delivery vehicles, intermediate-size collection vehicles, cargo vans, tractor-trailers, and administrative vehicles (sedans and vans). There are more than 725,000 postal employees, many of whom commute to large mail processing centers in urban areas with 24-hour operations. Numerous support operations, such as vehicle fueling and repair, are undertaken at postal facilities. In addition, the Postal Service operates approximately 35,000 buildings, many of which have stationary sources (boilers) and heating, ventilation, and air-conditioning (HVAC) systems currently using chlorofluorocarbons (CFCs) that must comply with standards established under the Amendments. The Amendments will affect how mail is delivered and how customers deliver the mail to postal facilities.

### **111.3 Compliance Time Frames**

The Amendments require the Postal Service to act within two time frames: the near term and long term. The near term calls for stopgap solutions to comply with air quality management plans, while the long term demands strategic planning to consider, for example, the appropriate vehicles, appropriate facilities, and appropriate HVAC systems that meet the objectives of the Amendments. Although the time frames established in the Amendments extend far into the future, the severity of air pollution in areas such as southern California and the Northeast Corridor has forced state and regional air quality control agencies to accelerate the implementation schedules provided in the federal statute.

### **111.4 Waiver of Sovereign Immunity**

Because the Amendments waive sovereign immunity for federal agencies, the Postal Service must comply with state, regional, and local air pollution compliance plans. The state implementation plan, for example, is the primary mechanism used by each state to ensure compliance with the Amendments within its boundary lines.

## **112 Policy**

The Postal Service policy is to comply with all aspects of the Amendments, including requirements imposed by state, regional, and local air quality control agencies. (See *Administrative Support Manual* 550, Environmental Management, and Management Instruction AS-550-91-11, Clean Air Act Compliance (Appendix A).) Exhibit 112 is a statement of the Postal Service's overall environmental policy.

***Postal Service policy is to comply with all aspects of the Amendments, including requirements imposed by state, regional, and local air quality control agencies.***



## ***United States Postal Service Policy for Environmental Protection***

### ***Policy***

In performance of its mission to provide prompt, reliable, and efficient postal services to all communities, the United States Postal Service will conduct its activities in a manner protecting human health and the environment. Our concern is for the well-being of our employees, our customers, and the communities we serve. The policy applies to all postal programs, products, and services.

### ***Guidelines***

We will comply with all applicable environmental laws and regulations governing our activities, and we will not hesitate to exceed legal requirements when, in our judgment, it is in order.

In establishing postal regulations and practices, we will, as appropriate, implement policies that:

- Encourage the use of nonpolluting technologies and waste minimization in the development of equipment, products, and operations.
- Promote the sustainable use of natural resources and protection of the environment through conservation, recycling, and reuse of material in our own processes and as we work with customers in the preparation of mail.
- Include environmental consideration among the criteria by which projects, products, processes, and purchases are evaluated.
- Develop in our employees an awareness of environmental responsibilities and encourage their adherence to sound environmental practices.
- Maintain an ongoing assurance program to measure our progress toward meeting our environmental objectives.



*Anthony M. Frank*

Anthony M. Frank  
Postmaster General

**Exhibit 112, Statement of Postal Service Environmental Policy**

### 113 Scope

The policies and guidelines in this handbook apply to all Postal Service employees, programs, products, services, and contractors.

### 114 Glossary of Terms

Appendix B contains a glossary of terms related to the Amendments.

## 120 Regulations

### 121 The Clean Air Act Amendments of 1990

#### 121.1 General

The Amendments enacted in 1990 set distinct milestones to measure compliance. There are eleven sections, referred to as "titles"; the first seven titles are most pertinent to the Postal Service and are briefly described below and in greater depth in Appendix C.

#### 121.2 Summary of the Amendments

**.21 Title I—Provisions for Attainment and Maintenance of the NAAQS.** EPA monitors six indicator pollutants for the primary protection of human health: ozone, carbon monoxide (CO), particulate matter (PM-10), sulfur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>), and lead (Pb). (See Exhibit C.1 in Appendix C.) The Amendments establish five classes of ozone violations (marginal, moderate, serious, severe, and extreme) and two categories (moderate and serious) for CO and particulates. Each category has its own compliance deadline and control requirements (Exhibit 121.21a). Areas with more severe pollution are given more time to comply, but they must adopt more stringent controls. Ozone, CO, and PM-10

Compliance Requirement	Category Year <sup>a</sup>
<b>Ozone</b>	
Marginal	1993
Moderate	1996
Serious	1999
Severe	2005-2007
Extreme	2010
<b>Carbon Monoxide</b>	
Moderate	1995
Serious	2000
<b>Particulate Matter (PM-10)<sup>b</sup></b>	
Moderate	1993

<sup>a</sup>Compliance with the Amendments must be obtained by the end of the year shown. States have the authority to accelerate the compliance dates.

<sup>b</sup>All PM-10 nonattainment areas are classified as moderate at this time.

### Exhibit 121.21a, Attainment Deadlines for Ozone, Carbon Monoxide, and Particulate Matter (PM-10)





are the three pollutants of most concern to the Postal Service. The maps in Exhibits 121.21b, 121.21c, and 121.21d show the nonattainment regions for ozone, CO, and PM-10, respectively.

**.22 Title II—Provisions Relating to Mobile Sources.** Title II defines pollution reduction requirements for motor vehicles and therefore is very significant to the Postal Service in terms of its large vehicle fleet. Title II requires centrally fueled fleets to burn only clean fuels in areas with CO levels above 16 parts per million (ppm) or in areas designated as seriously, severely, or extremely above the limit for ozone (see section 233 of this handbook). Appendix D lists the nonattainment areas for ozone, Appendix E covers CO, and Appendix F lists the areas for PM-10.

**.23 Title III—Hazardous Air Pollutants.** Hazardous air pollutants are those that are hazardous to human health or the environment but are not specifically covered under other portions of the Clean Air Act. The law includes a list of 189 toxic air pollutants for which emissions must be reduced (see Appendix G).

**.24 Title IV—Acid Deposition Control.** Title IV regulates the sources of acid deposition (in the United States, most of it comes from the burning of fossil fuels) and affects the Postal Service primarily because of its operation of facility boilers.

**.25 Title V—Permits.** By requiring all major sources of air pollution to obtain permits, Title V will extend emissions controls to thousands of sources in many areas that until now have remained unregulated. This directly affects Postal Service facilities.

**.26 Title VI—Stratospheric Ozone Protection.** Title VI requires a complete production phaseout of ozone-depleting chemicals (especially CFCs and halons). (See Appendix H.)

**.27 Title VII—Provisions Relating to Enforcement.** The Amendments contain a broad array of provisions to make the law more readily enforceable, thus bringing it up to date with the other major environmental statutes.

---

***The primary vehicle used by the states to carry out the Amendments is the state implementation plan.***

---

## 122 State and Local Regulations

### 122.1 General

**.11 State Implementation Plans.** The Amendments waive sovereign immunity for federal agencies and also empower the states to carry out the statute. The primary vehicle used by the states to carry out the Amendments is the state implementation plan. Under these plans, states and local and regional air quality districts have responsibility for issuing permits, monitoring compliance, and enforcing regulations. As a result, the Postal Service must comply with state, regional, and local air pollution compliance plans promulgated pursuant to the Clean Air Act or any of its amendments. Appendix I provides all federal and state air quality control agencies and contacts and regional organizations for acid deposition, enforcement, implementation plans, monitoring, new source review, ozone, CO, particulate matter, and public information.

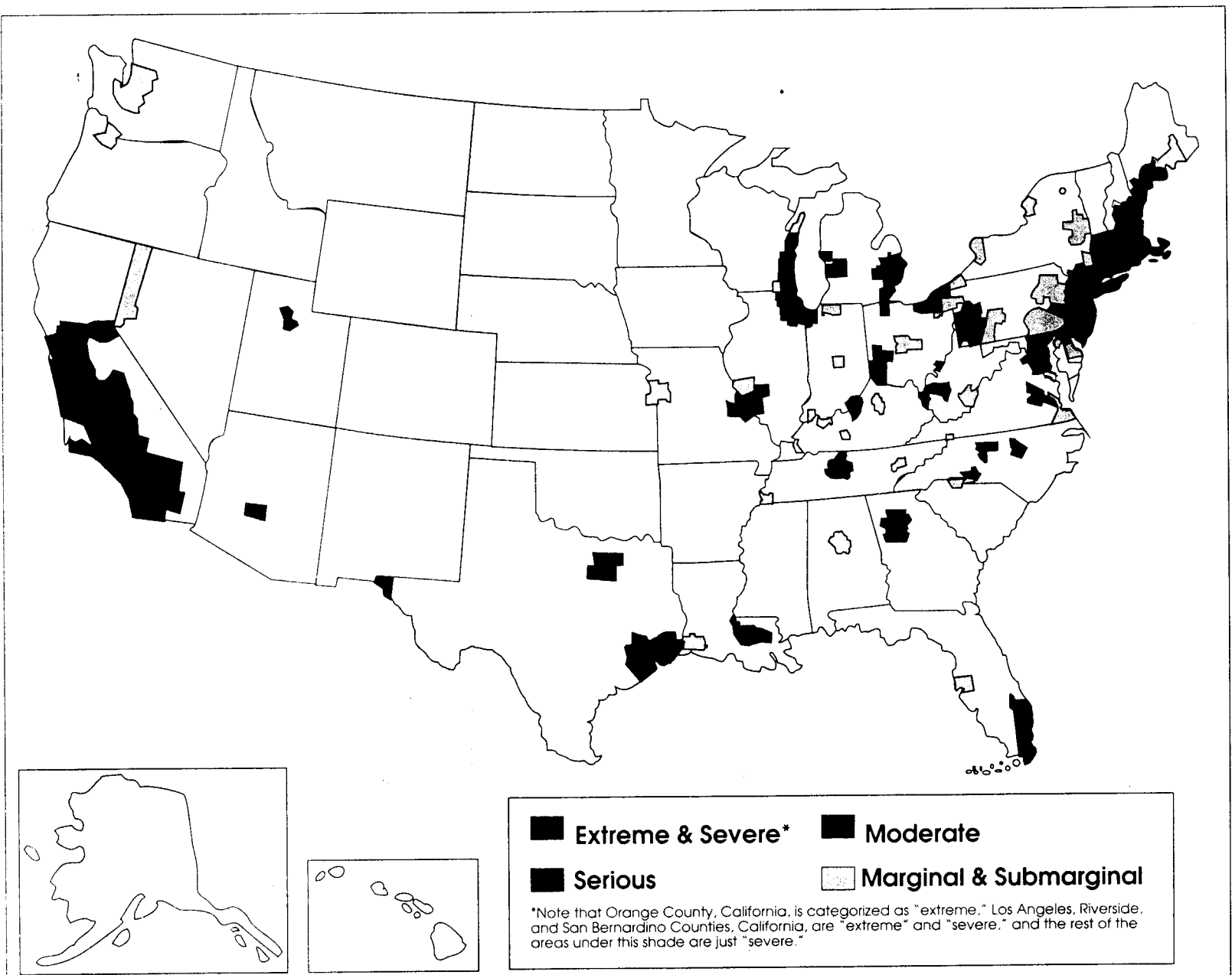


Exhibit 121.21b, Ozone Nonattainment Areas in the United States

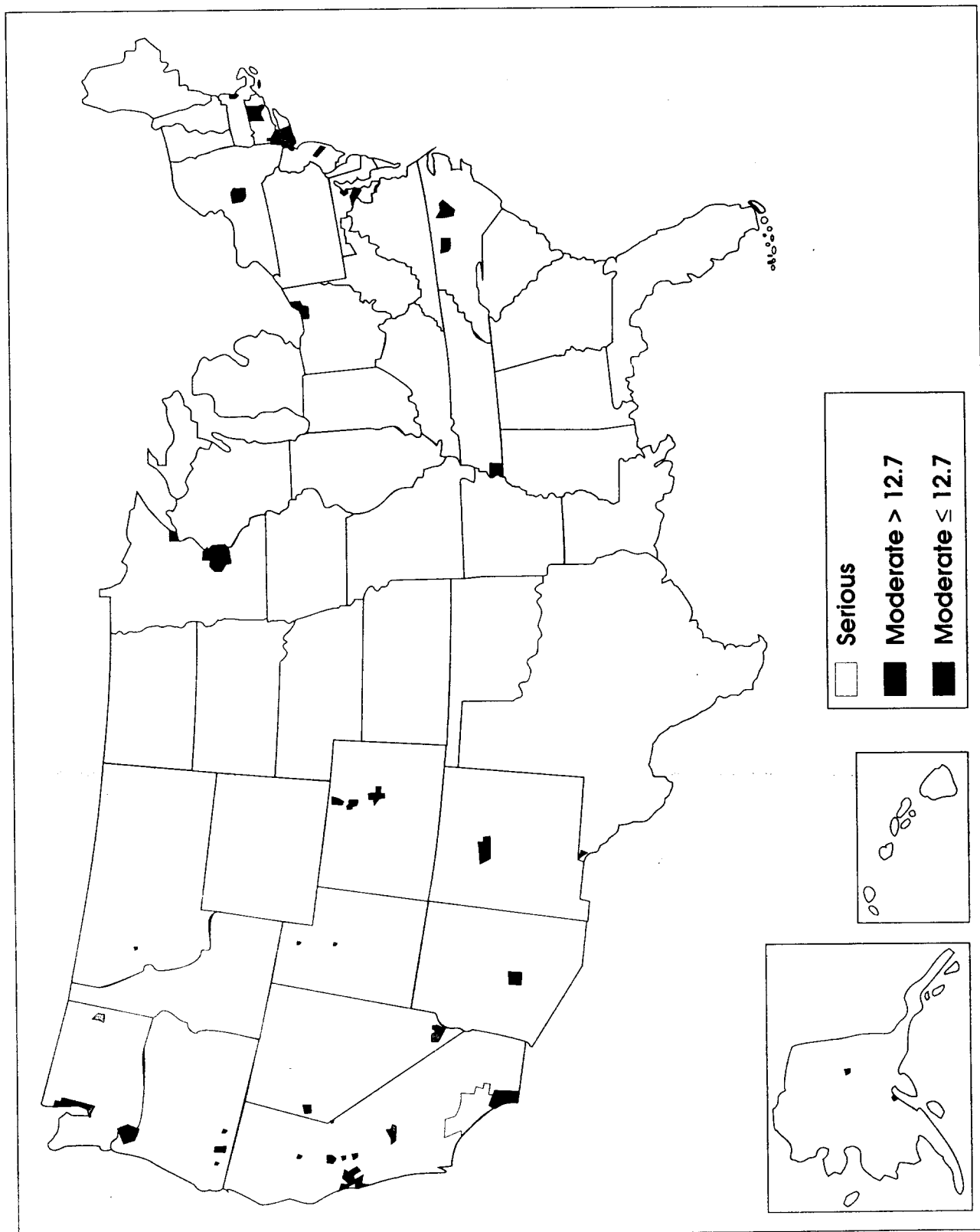


Exhibit 121.21c, Carbon Monoxide Nonattainment Areas in the United States

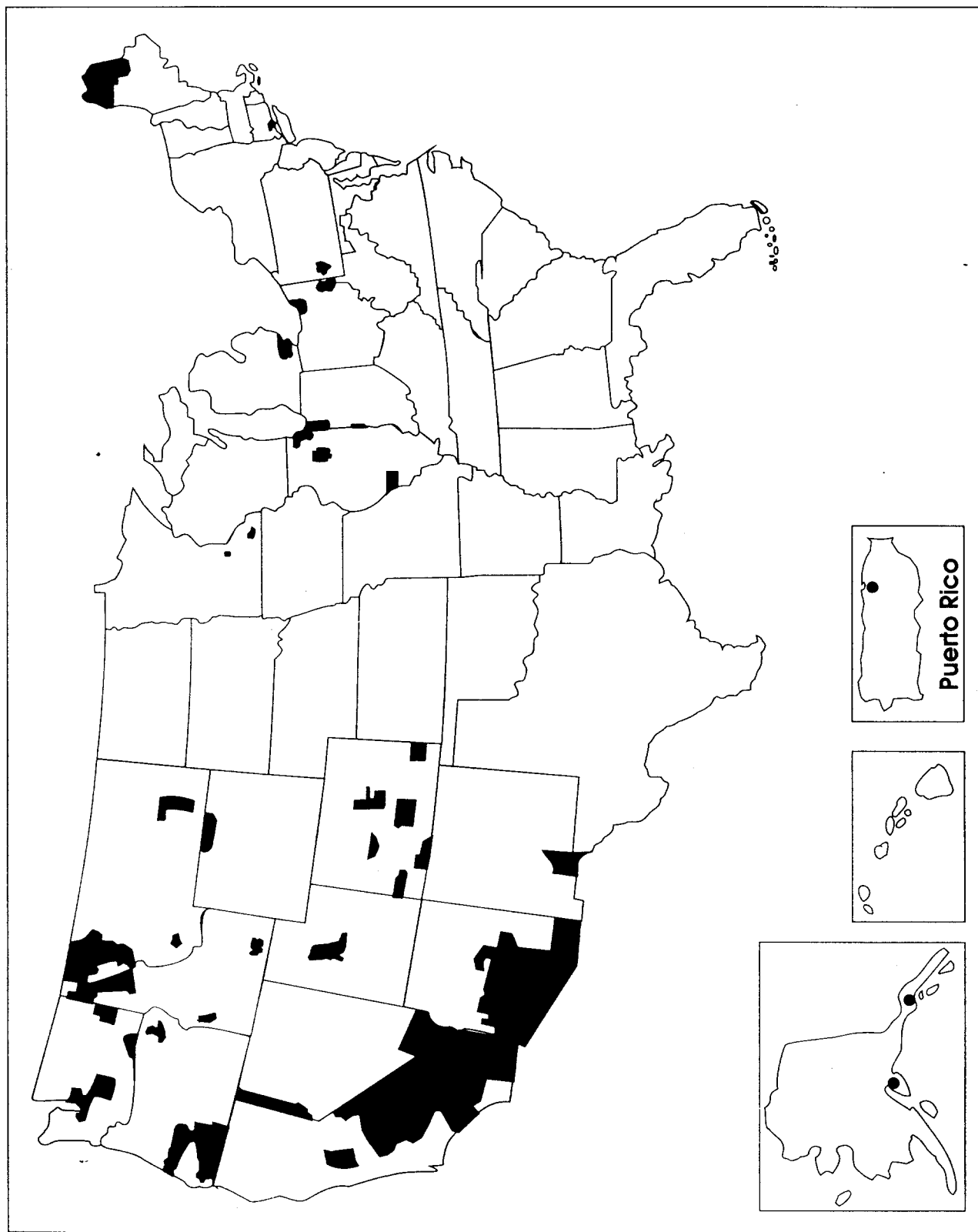


Exhibit 121.21d, PM-10 Nonattainment Areas in the United States

**.12 Inspections and Enforcement.** Local, regional, and state environmental officials acting pursuant to the state implementation plan are entitled to enter postal facilities to ensure compliance. They may also carry out the enforcement provisions of the Amendments, including civil and criminal penalties.

#### **122.2 Air Quality Districts**

Air quality management districts are areas formed by either state or local regulatory agencies for the purpose of managing pollutants being emitted from a specific geographical area. The area's boundaries may have been formed by political boundaries or other factors. Appendix J lists all known current air quality management districts in the United States. Additional districts may be formed in the future.

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***Local, regional, and state environmental officials acting pursuant to the state implementation plan are entitled to enter postal facilities to ensure compliance and may carry out the enforcement provisions of the Amendments, including civil and criminal penalties.***

---

## **130 General Responsibilities**

Exhibit 130 is an organizational chart that shows the various responsibilities throughout the Postal Service for clean air compliance.

### **131 Headquarters**

#### **131.1 Senior Assistant Postmaster General, Administrative Services Group**

As the chief environmental officer for the Postal Service, the Senior Assistant Postmaster General, Administrative Services Group, is responsible for overall policy and program development.

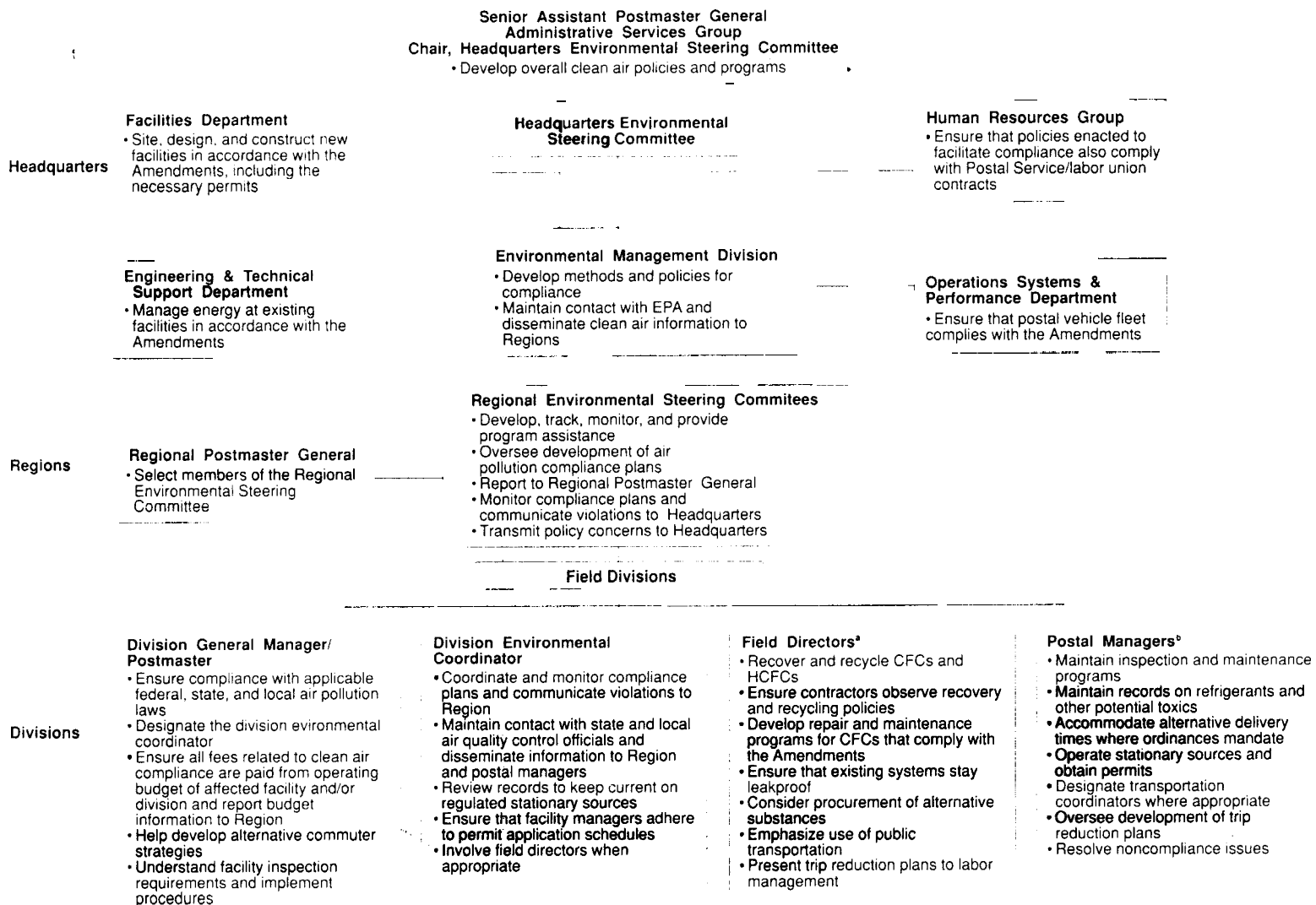
#### **131.2 Headquarters Environmental Steering Committee**

The Headquarters Environmental Steering Committee is chaired by the chief environmental officer and is composed of the following officers:

- Assistant Postmaster General, Labor Relations Department
- Assistant Postmaster General, Procurement and Supply Department
- Assistant Postmaster General, Engineering and Technical Support Department
- Deputy General Counsel
- Assistant Postmaster General, Government Relations Department
- Assistant Postmaster General, Delivery, Distribution, and Transportation Department
- Assistant Postmaster General, Controller Department
- Assistant Postmaster General, Operations Systems and Performance Department
- Assistant Postmaster General, Facilities Department
- Assistant Postmaster General, Employee Relations Department
- Assistant Postmaster General, Marketing and Customer Services Group



## Exhibit 130, Organizational Chart Showing Clean Air Compliance Responsibilities



\*These are the directors of operations support, support services, and human resources; the handbook specifies the responsibilities of each director

\*These are fleet, operations, or facility managers; the handbook specifies for each type of manager.

Note: If the roles and responsibilities shown in this exhibit conflict with those set forth in the text of this handbook, the text takes precedence.

### **131.3 Environmental Management Division, Administrative Services Group**

The Environmental Management Division is responsible for developing policies and methods for compliance with the Amendments and will work with the Operations Support Group at Headquarters to ensure that national policies and methods are not adversely affected.

### **131.4 Human Resources Group**

The Human Resources Group is responsible for ensuring that environmental policies enacted to facilitate Amendments compliance, which affect employee working conditions; safety, and health, comply with the legal requirements governing the Postal Service/union labor contracts in effect at the time.

### **131.5 Operations Systems and Performance Department**

The Operations Systems and Performance Department is responsible for Postal Service vehicle fleet compliance with the provisions of the Amendments, including requirements related to tailpipe emissions, the use of clean fuels, and other areas as described in Chapter 2 of this handbook.

### **131.6 Engineering and Technical Support Department**

The Engineering and Technical Support Department is responsible for energy management at existing facilities in accordance with the Amendments.

### **131.7 Facilities Department**

The Facilities Department is responsible for siting, designing, and constructing new facilities in accordance with the provisions of the Amendments (more fully discussed in Chapter 3 of this handbook).

## **132 Regions**

### **132.1 Regional Postmaster General**

This individual has overall responsibility for postal operations at the regional level and has responsibility for selecting members of the regional environmental steering committee. The regional environmental steering committee reports significant findings to the regional postmaster general.

### **132.2 Regional Environmental Steering Committee**

Within its region, each regional environmental steering committee is responsible for developing, tracking, monitoring, and providing program assistance at all levels of the field organization. In cases where several field divisions are included within the same air quality management district, it will be the responsibility of the committee to oversee the development of the air pollution compliance plans.

## **133 Divisions**

### **133.1 Field Division General Manager/Postmaster**

**.11 General Responsibilities.** The field division general manager/postmaster has primary responsibility for ensuring compliance

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*The field division general manager/postmaster has primary responsibility for ensuring compliance with applicable federal, state, and local air pollution laws.*

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with applicable federal, state, and local air pollution laws. He or she must designate a DEC to oversee the division's environmental programs.

**.12 Fees.** The field division general manager/postmaster must ensure that all fees related to supporting air pollution regulatory programs are paid from the operating budget of the affected facility and/or field division.

### **133.2 Division Environmental Coordinator**

The DEC, as designated by the field division general manager/postmaster, is responsible for source registration, permit requirements (including fees), emissions testing, and the development of compliance plans. The DEC must provide copies of all implementation plans to his or her regional environmental steering committee. In addition, the DEC should monitor all compliance activities, including facility inspections by air quality control agencies. The facility inspections must be coordinated so as to avoid disrupting postal operations or the safety of mail.





## Chapter 2 Postal Operations

### 210 General

The Headquarters Environmental Steering Committee, the regional environmental steering committees, and the division environmental coordinators (DECs) must work together to monitor compliance strategies and communicate violations to appropriate postal units. Committee and coordinator communication with state and local air quality control agencies that are developing clean air regulations should help such agencies become aware of Postal Service needs in its business operations. This chapter provides guidelines for addressing potential postal operations problems that may result from state and local air pollution compliance plans. Operations that may be affected include delivery services, the vehicle fleet, business mail delivery to postal facilities, retail services, and finance.

### 220 Delivery Services

#### 221 General

The basis of Postal Service operations is the organization's ability to deliver the mail to the American public. Because, in general, vehicles contribute heavily to ozone and 90 percent of the carbon monoxide (CO) pollution, many cities and regions with ozone and CO problems will attempt to restrict vehicle movements, especially during peak periods, including the morning (generally between 6:00 and 9:00 a.m.) and afternoon (generally between 4:00 and 7:00 p.m.). In addition, there may be efforts to curtail vehicle movement during smog alerts. More specifically, attempts have been made to eliminate truck traffic during peak hours to facilitate traffic flow and, subsequently, reduce mobile source emissions.

#### 222 Guidelines

All DECs must monitor the efforts of local, regional, or state air quality control agencies that are limiting the Postal Service's ability to move the mail, especially efforts to limit truck traffic. Any information obtained must be forwarded immediately to the respective regional environmental steering committee. The DEC should identify a point of contact at each air quality control agency to expedite communications between the agency and the Postal Service. Specific information about postal vehicle movements and contracted routes (time of operation, vehicle type, origin/destination of travel) can be obtained by consulting transportation management service centers, which may have access to internal transportation data bases, such as the Postal Vehicle System (PVS) and the Transportation Information Management Evaluation System (TIMES).

---

***Committee and coordinator communication with state and local air quality control agencies that are developing clean air regulations should help such agencies become aware of Postal Service needs in its business operations.***

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## 230 Vehicle Fleet

### 231 General

#### 231.1 Background

The Clean Air Act of 1970 gave special attention to motor vehicles because they have been the primary sources of hydrocarbons, CO, and NO<sub>x</sub> in the atmosphere. Even though progress had been made in controlling these emissions, they were again the focus of special attention in the Amendments of 1990, primarily because 50 million more cars were on U.S. highways in 1991 than in 1970. Because of this and the failure of most large urban areas to meet the ambient air standards for ozone and/or carbon dioxide, the Amendments establish standards and requirements for tailpipe emissions; clean fuels, including reformulated gasoline and oxygenated fuels; gasoline volatility; desulfurization of diesel fuels; lead in gasoline; new vehicle warranties; inspection and maintenance programs; refueling controls; control of vehicle refrigerants; and reduction of vehicle trips.

#### 231.2 Clean Fuel Credits Program for Fleets

The Amendments mandate that the states administer a clean fuel fleets credit program once EPA promulgates regulations for such a program. Fleet operators will receive credits for the purchase of (1) more clean fuel vehicles than required, (2) clean fuel vehicles that meet more stringent standards than those established by EPA (such as ultra-low emission and zero emission vehicles), and (3) vehicles in categories not covered in the fleet program but meeting ultra-low emission and zero emission vehicle standards. The purpose of issuing credits is to assist fleet operators in complying with the clean fuel fleet program without sacrificing the program's air quality benefit in each nonattainment area. Credits may be used to demonstrate compliance with the fleet program requirements, or they may be held, traded, or sold for use by any other person to demonstrate compliance within the same nonattainment area.

### 232 Vehicle Emissions Requirements

The Amendments establish stricter pollution standards than the 1970 act for emissions from automobiles and trucks. These standards will reduce tailpipe emissions of hydrocarbons, CO, and NO<sub>x</sub>. Beginning in 1994, new vehicles purchased by the Postal Service (cars and light-duty trucks up to 6,000 pounds) will have stricter emission controls. This will affect fleet management because appropriate emissions standards will have to be maintained for nonmethane hydrocarbons, CO, and NO<sub>x</sub>.

### 233 Clean Fuel Fleet Requirements

#### 233.1 General

The Amendments require that all serious, severe, and extreme ozone nonattainment areas with a 1980 population of 250,000 and all serious CO nonattainment areas (those at or above 16.5 ppm) with a population of more than 250,000 adopt a clean fuel fleet program (a "fleet" means ten or more vehicles). The Amendments also require that a percentage of new vehicles purchased for fleets in the covered areas be clean fuel vehicles, beginning in model

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***The Amendments require that all serious, severe, and extreme ozone nonattainment areas with a 1980 population of 250,000 and all serious carbon monoxide nonattainment areas with a population of more than 250,000 adopt a clean fuel fleet program.***

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year 1998. These vehicles must use clean alternative fuels when operating in the covered (nonattainment) area. This will apply to the Postal Service in the areas shown in Exhibit 233.1.

### **233.2 Acceptable Clean Fuels**

The Office of Fleet Management (OFM) has the responsibility for determining acceptable alternative fuels. OFM has tested a number of alternative fuels, including electricity, liquefied petroleum gas, liquefied natural gas, hydrogen, methanol/ethanol, alcohol blends, and compressed natural gas (CNG); the office is available to help establish programs where required (see Exhibit 233.1). The Amendments establish strict emissions performance requirements for light-duty trucks and allow the use of vehicles converted to CNG operation as a means of compliance. CNG provides an operationally proven alternative. Further guidance in this area is the responsibility of OFM.

### **233.3 Implementation of a Clean Fuels Program**

OFM also has the responsibility for implementing clean fuel programs. The Amendments provide that if federal facilities provide alternative fuels on-site, such fuels shall be offered for sale to the public for use in other vehicles, unless such fuels are commercially available within a reasonable distance of the federal facility. Selling such fuels to the public will require careful postal planning.

### **233.4 Exemption from Transportation Control Measures**

Clean fuel postal vehicles may not be subject to transportation control measures (TCMs) or other commuting controls (such as driving during nonpeak hours) that restrict vehicle usage in cities with pollution violations, unless the TCM is safety related. State and local authorities need to be consulted for further information.

## **234 Reformulated Fuels**

### **234.1 Reformulated Gasoline Requirement**

Beginning in 1995, reformulated gasoline with a 2-percent minimum oxygen content will be required in the areas shown in Exhibit 234.1. This "oxygenated" fuel is presently being sold as gasoline with 10 percent ethanol or 15 percent methyl tertiary butyl ether (MTBE) as additives and will not jeopardize vehicle warranties. Other ozone nonattainment areas (see Appendix D) may choose to use these fuels.

### **234.2 Other Vehicle Fuel Requirements**

Several requirements will force the Postal Service to use cleaner fuels and will improve the performance and reduce the maintenance of postal fleet vehicles. Postal officials involved in the procurement of vehicle fuels must be aware of the following requirements (also see Appendix C):

- a. Beginning on November 1, 1992, gasoline in certain CO nonattainment areas during certain times of the year must have a 2.7-percent minimum oxygen content.
- b. Beginning in 1992, gasoline volatility must be reduced to 9 pounds per square inch (psi). EPA can set lower levels in warmer areas.

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***Compressed natural gas provides an operationally proven alternative.***

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***The Office of Fleet Management is responsible for implementing clean fuel programs. If federal facilities provide alternative fuels on-site, such fuels shall be offered for public sale, unless these fuels are commercially available within a reasonable distance of the federal facility.***

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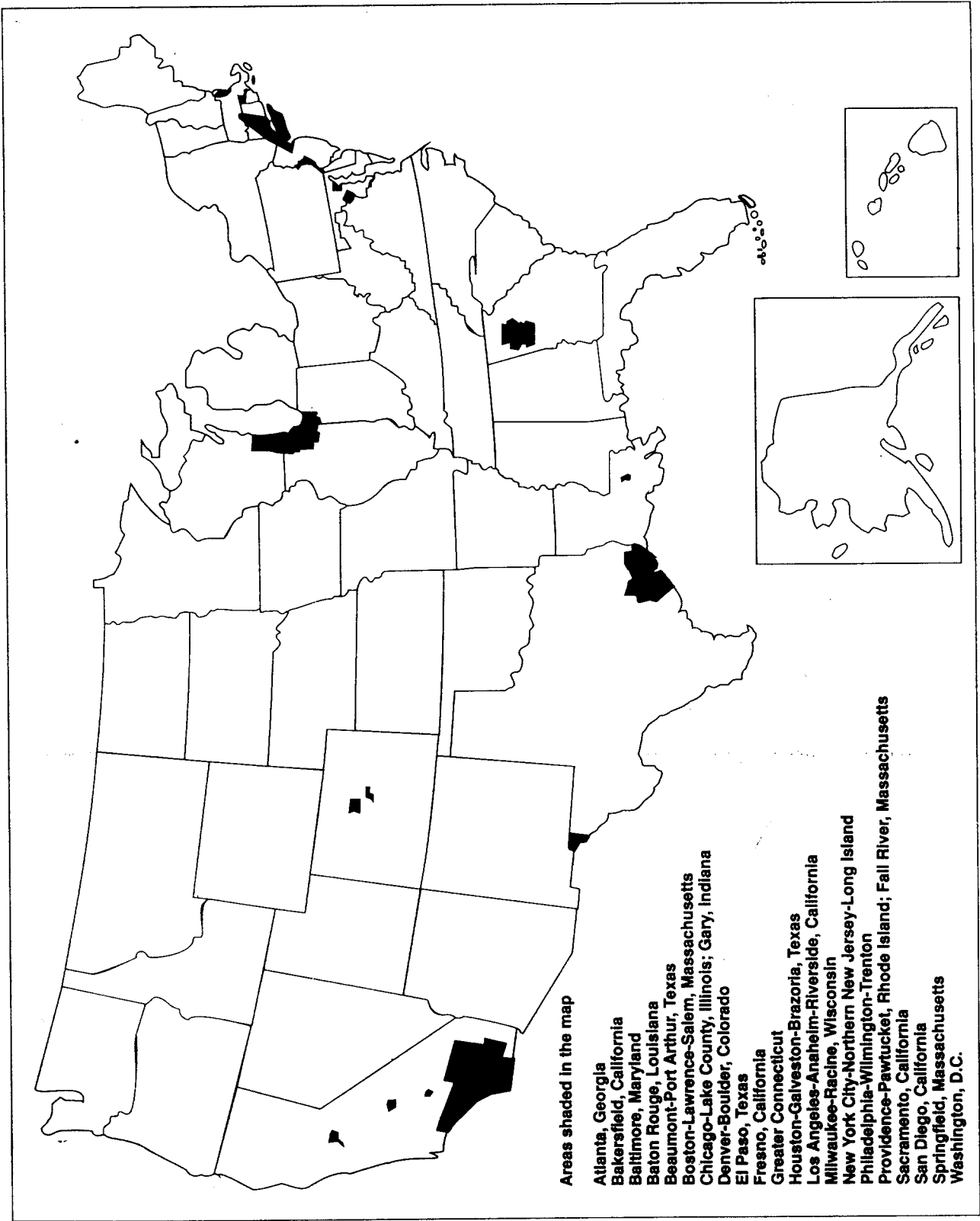


Exhibit 233.1, Nonattainment Areas That Must Have Clean Fuel Vehicles by 1998

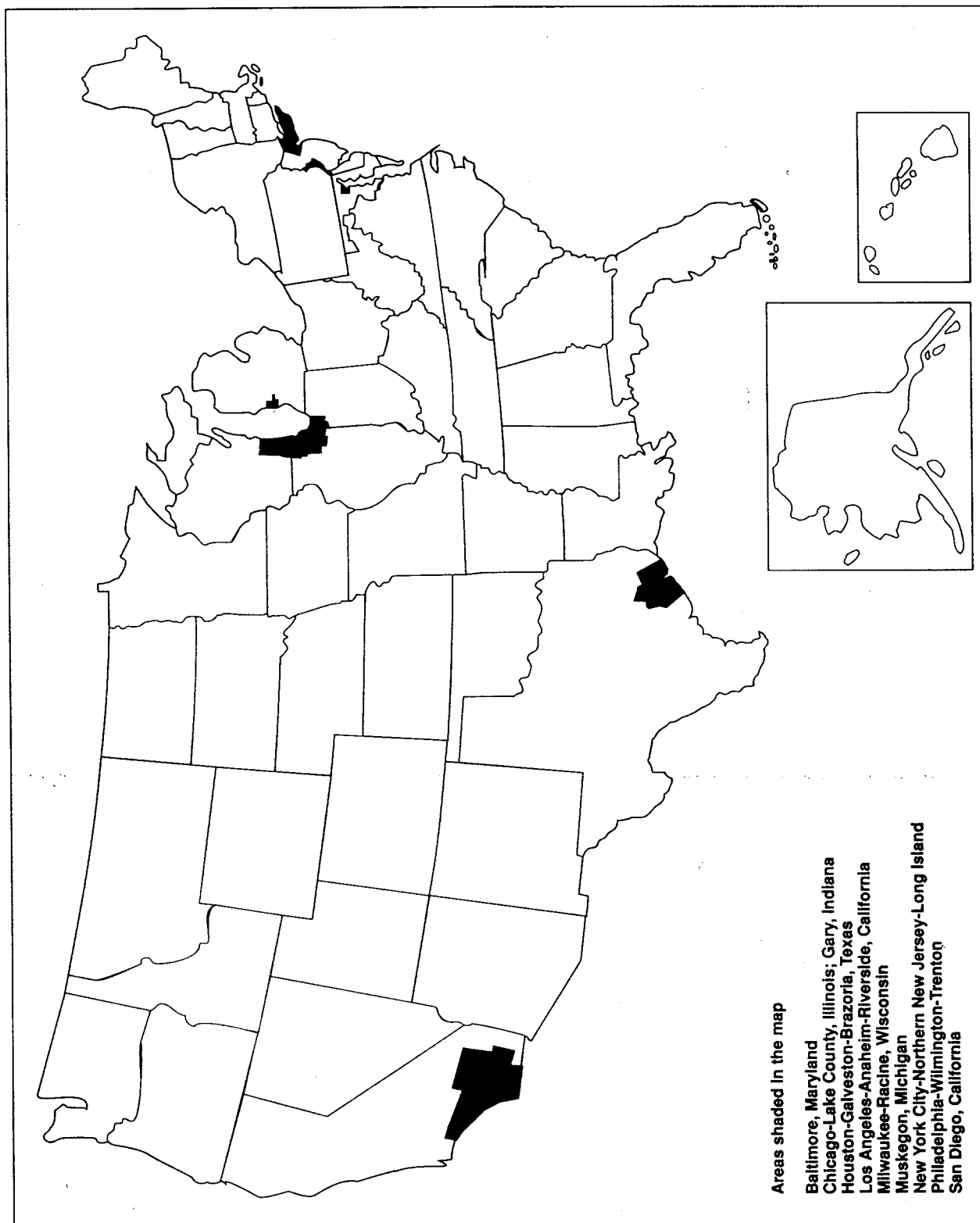


Exhibit 234.1, Areas That Must Have Reformulated Gasoline  
With a 2-Percent Oxygen Content by 1995

but it cannot require any standard below 9 psi in attainment areas.

- c. Effective on October 1, 1993, the sulfur content of motor vehicle diesel fuel may not exceed 0.05 percent by weight, and it must meet a minimum cetane rating of 40. (The cetane rating for diesel fuel is comparable to the octane number rating for gasoline.)
- d. Starting on January 1, 1995, any gasoline sold nationwide must contain additives to prevent the accumulation of deposits in engines and fuel supply systems.
- e. After December 31, 1995, it will be unlawful to sell, supply, dispense, transport, introduce into commerce, or use gasoline that contains lead or lead additives for highway use.

## 235 Inspection and Maintenance Program

### 235.1 General

Inspection and Maintenance (I&M) is a program (mandated by the Clean Air Act) requiring periodic inspections of vehicles to ensure that emissions of specified pollutants are not exceeding established limitations. The Amendments require that all ozone and CO nonattainment areas in the United States have an I&M program. Annual inspection programs are required unless a state can demonstrate that a biennial program is just as effective.

### 235.2 Inspection Certification

Division fleet managers must ensure that postal vehicles in CO and ozone nonattainment areas meet the state I&M requirements. In the past, states and local air quality control agencies have certified vehicle maintenance facilities (VMFs) to perform these inspections. To the extent possible, this will continue in the future.

## 236 Refueling Controls

Beginning in 1992, gasoline pumps in the ozone nonattainment areas (see Appendix D) will be required to install gasoline vapor recovery systems. However, the moderate ozone nonattainment areas will be exempted when EPA promulgates regulations requiring vehicles to contain on-board vapor recovery systems. This will affect many sites where postal vehicle fueling takes place and essentially requires that division fleet managers install new dispensing equipment. Whenever possible, this work should be coordinated with the ongoing underground tank management program. (See Chapter 3, section 345.)

## 237 Vehicle Refrigerant Recovery

### 237.1 General

Freon or R-12 (a CFC compound), the refrigerant used in most motor vehicles' air conditioners, is one of the compounds that contributes to stratospheric ozone depletion and global warming. OFM developed a CFC recycling policy (see Fleet Management Bulletin V-17-91, "Chlorofluorocarbon (CFC) Recycling Policy" in Appendix K), which requires, beginning on or after January 1, 1992, the following: recovery and recycling equipment, recovery

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***Inspection and Maintenance (I&M) is a Clean Air Act program requiring periodic inspections of vehicles to ensure that emissions of specified pollutants are not exceeding established limitations.***

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and recycling testing, refrigerant containers, and refrigerant records. The division fleet manager is responsible for ensuring compliance.

### 237.2 Recovery and Recycling Equipment

VMFs performing installation, service, repair of motor vehicle air conditioners, any other related repair of air conditioners, or salvage of motor vehicles equipped with air conditioners must obtain and use refrigerant recovery and recycling equipment that has a certificate of approval issued by Underwriters Laboratories or any other independent testing organization that attests that the equipment meets or exceeds the applicable Society of Automotive Engineers' standards of performance. The Postal Service will not install, service, modify, or dispose of any motor vehicle air conditioner or perform repairs or modifications that may release refrigerants unless that person recovers or recycles all the refrigerants with approved recovery or recycling equipment and employs procedures for the use of the equipment as specified by the manufacturer and does not dispose of the refrigerants. Before operating recovery, recycling, or charging equipment, employees must receive a certificate of training from the equipment manufacturer or from an equivalent training program.

### 237.3 Recovery and Recycling Testing

The recovery, recycling, or charging equipment must be tested for leaks using an electronic halogen leak detector at least every six months. A leak detected in recovery, recycling, or charging equipment must be repaired within two business days after the leak is first detected, unless the equipment does not leak or if its use is discontinued. Refrigerants shall not be added to a vehicle unless the system has been tested with a halogen leak detector, or fluorescent tracer dye and ultraviolet lamp, and has been found to have no leaks.

### 237.4 Refrigerant Containers

The purchase or use of any refrigerants in containers with a capacity of less than 20 pounds is prohibited.

### 237.5 Refrigerant Records

Records of the following information must be maintained for at least two years by the fleet manager at the repair facility:

- a. Pounds of refrigerants purchased, used, recovered, recycled, and stored per calendar year.
- b. Semiannual maintenance records for the recovery, recycling, or charging equipment, including the name of the person performing the maintenance, the dates the maintenance was performed, the results of leak tests, and the records of what equipment was checked, modified, serviced, or replaced.
- c. Annual documentation of the training of all personnel performing or supervising refrigerant recovery, recycling, or charging.
- d. Annual documentation, by receipt or other verification, for a refrigerant that is shipped off-site, if recycling or charging is not done on the premises.

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***Freon or R-12 (a CFC compound), the refrigerant used in most motor vehicles' air conditioners, is one of the compounds that contributes to stratospheric ozone depletion and global warming.***

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## 240 Business Mail Delivery to Postal Facilities

The Amendments may influence the ability of businesses to bring mail to postal facilities in much the same way as they affect postal delivery services (see section 221). The DEC should coordinate with the account representatives to share information about proposed truck reduction ordinances with business mailers. Operations managers should also be prepared to accommodate alternative delivery times for large shipments of business mail in communities that have enacted truck reduction ordinances and where no exemption has been provided for the movement of mail.

## 250 Retail Services

### 251 General

Retail services include Express Mail, first-class mail, second-class mail, third-class mail, fourth-class mail (parcel post), individual and centralized delivery, collect-on-delivery (COD) service, priority mail, forwarding mail, Mailgram™, post office box and caller services, easy stamp services, cash receipts, certificate of mailing, certified mail, claims, insurance, merchandise return service, money orders, recorded delivery, registered mail, restricted delivery, return receipts, special delivery, special handling, INTELPOST, and international mail. There may be some long-term impacts on postal retail business in ozone and CO nonattainment areas, primarily because of controls on vehicle use.

### 252 Guidelines

When selecting sites for new facilities, the Facilities Department, the Operations Systems and Performance Department, and the Delivery, Distribution, and Transportation Department should consider possible restrictions on vehicle use in ozone and CO nonattainment areas and customer access to alternative transportation, such as public transit and pedestrian and bicycle access. Alternative services, such as stamps on consignment, contract postal units, stamps by mail, stamps by phone, stamp vending machines, and stamps in automated teller machines may become more popular service arrangements in these areas. The division operations manager is responsible for decisions about using such services and should be advised by the DEC about how local air quality regulations will affect traditional services.

## 260 Finance

### 261 General

#### 261.1 Facility Budgets

The Amendments will affect facility budgets, especially facilities with permitted stationary sources and those within ozone and CO nonattainment areas. For example, the training of transportation coordinators, filing fees for trip reduction plans, expenses related to trip reduction initiatives, or other expenses may be required and should be planned for in budgets.

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***Projections of annual costs associated with Amendments compliance should be undertaken by the field divisions and reported to the regional director of finance and shared with the regional environmental steering committee.***

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**261.2 Baseline Fee**

The Amendments establish a baseline annual fee of \$25 per ton per regulated pollutant for stationary sources, excluding CO. The \$25-per-ton fee will be increased each year to account for inflation by using the Consumer Price Index. However, the law allows more than or less than \$25 per ton. Consequently, states may charge more than \$25 per ton to cover program costs or less than \$25 per ton if desired.

**262 Accounting**

All facility and vehicle compliance costs associated with clean air compliance other than employee transit incentives should be charged to account 56501. Employee transit incentives should be charged to account 56503. Projections of annual costs associated with compliance with the Amendments should be undertaken by the field divisions and reported to the regional director of finance and shared with the regional environmental steering committee.





## Chapter 3 Postal Facilities

### 310 General

The Amendments will affect the numerous facilities operated by the Postal Service in various ways, such as:

- a. Regulation of stationary sources (boilers, cogeneration facilities, direct-fired absorption equipment, auto body/paint shops, and so forth).
- b. Production phaseout of ozone-depleting substances, including refrigerants used in heating and cooling systems, fire suppressants, and solvents.
- c. Implications for the future design and location of facilities and their components.
- d. Mitigation processes required under the National Environmental Policy Act (NEPA) may involve mass transit, carpooling, vanpooling, and other modes to reduce vehicle miles traveled.
- e. Indoor air quality.

### 320 Stationary Sources

#### 321 Definitions

A stationary source of air pollution is an immobile piece of equipment, such as a boiler, paint spray booth, solvent cleaning area, and so forth, that has the capacity to release pollutants into the atmosphere. The division environmental coordinator (DEC) should review division records to see what facilities are currently regulated and should then check with the local air quality control agency to determine what additional facility equipment and sources are subject to regulation. Information on the emissions limits should also be obtained. The equipment and/or source is typically regulated if it emits a certain volume of pollutants and/or a certain type of pollutant. The control of emissions becomes greater if the source happens to be located in an ozone, CO, or particulate nonattainment area.

#### 322 Permits

Future regulations promulgated from the Amendments will require operating permits for stationary sources to ensure compliance with all applicable requirements of the Clean Air Act and to enhance EPA's ability to enforce the Act. There can be only one permit required per facility with multiple sources, but the DEC should check with local authorities. Each permit issued to a facility will be for a fixed term of up to five years. The new law establishes a permit fee, whereby the state collects a fee from the permitted facility to cover reasonable direct and indirect costs of the permitting program. The DEC must ensure that the facility manager adheres to all schedules for completion of the permit application.

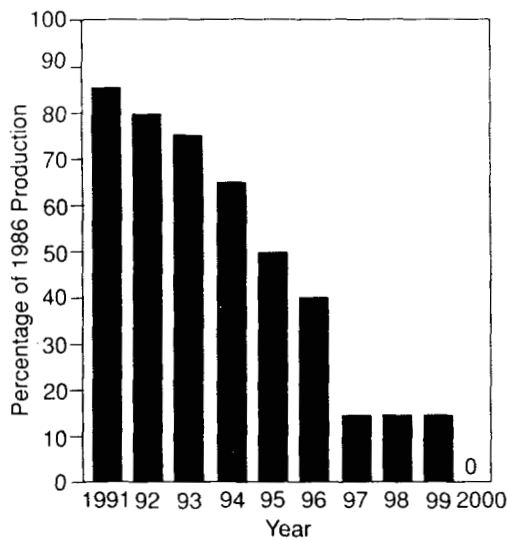
#### 323 Clean Fuel Requirements

Conversion of boilers from heating oil to cleaner burning fuels (such as natural gas) may be required in some urban areas, especially those with high ozone pollution. Therefore, the DEC must

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***The division environmental coordinator should review division records to see what facilities are currently regulated and should then check with the local air quality control agency to determine what additional facility equipment and sources are subject to regulation.***

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**Exhibit 331.1, Permitted  
Production of  
Chlorofluorocarbons**

***The facility manager is responsible for the operation of stationary sources (including obtaining permits).***

keep in continual contact with the state or local air quality control agency to be able to plan for such changes. These conversions should also be coordinated with the division underground storage tank coordinators.

### 324 Guidelines

Stationary sources with permits will be required to monitor and measure emissions to ensure compliance with the permit conditions. The actual monitoring and analysis will have to be performed in compliance with the permit and EPA- or state-approved methods. At some facilities, environmental contractors may assist in this activity. The facility manager is responsible for the operation of stationary sources (including obtaining permits). Permits must be kept on file, along with records of all modification or repairs made to the stationary source. If improvements to the stationary source are needed, they must be made in a timely manner, especially if they are needed to keep the source in compliance with the permit. Provisions of permits must be met at all times. Failure to do so may result in an enforcement action. *The Postal Service must pay permit fees as long as companies and nongovernmental entities pay comparable fees for the operation of the state air pollution program.* The source of all fees will be the operating budget of the impacted facility and/or field division. All fees related to Clean Air Act and Amendments compliance other than employee transit incentives (account 56503) should be charged to account 56501.

## 330 Ozone-Depleting Substances

### 331 General

#### 331.1 CFCs, HFCs, and HCFCs

Chlorofluorocarbons (CFCs) are chemical compounds widely used as refrigerants in air-conditioning and refrigeration systems. There are several different compounds in the CFC family. (Related to the CFC family are two different chemical families also usable as refrigerants—hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs).) The primary CFC-based refrigerants used in the heating, ventilation, and air-conditioning (HVAC) industry are R-11, R-12, R-113, and R-500 for centrifugal chillers and R-22 for reciprocating, helical rotary compressors and high-tonnage centrifugal chillers. Because of the adverse effects of these chemicals on the ozone layer, production of CFCs is being phased out. Exhibit 331.1 shows the permitted production of CFCs (allowed by the Amendments) during this decade, in terms of the percentage of the production in 1986.

#### 331.2 Ozone Depletion Potential

The potential for a compound to deplete ozone is determined by the "ozone depletion potential" (ODP). The ODP assigns a numerical value ranging from 0 (no ozone depletion potential) to 1.0 (greatest potential). Exhibit 331.2 ranks the ODP values for the most common refrigerants currently being used. The ODP should be considered when selecting refrigeration compounds.



Refrigerant	Ozone Depletion Potential (ODP)
R-11 (CFC)	1.0
R-12 (CFC)	1.0
R-113 (CFC)	0.8
R-500 and R-502 (CFC)	0.74
R-22 (HCFC)	0.05
R-123 (HCFC)	0.02
R-134a (HFC)	0

Source: Clean Air Act Amendments of 1990, section 602(e). The figure for R-500 and R-502 is from the March 1989 issue of "CFC Update," published by Trane™.

### **Exhibit 331.2, Ozone Depletion Potential Values of the Most Common Refrigerants Used by the Postal Service**

#### **331.3 Other Substances**

Halons, carbon tetrachloride, and methyl chloroform (classified as Class I substances) also damage ozone. Methyl chloroform, also known as 1,1,1-trichloroethane, is the principal cleaner and solvent used to maintain postal automated equipment. Therefore, alternatives that are cost and performance effective and do not deplete the ozone will eventually need to be used.

#### **331.4 Clean Air Requirements**

The Amendments provide requirements for the use, purchase, sale, and disposal of CFCs, including the provision for the mandatory phaseout of CFC production and use to avoid the long-term health risks posed by the depletion of the ozone layer. All substances identified as Class I will be phased out from production by the year 2000 (2002 for methyl chloroform), while all Class II substances will be phased out from production by 2030 (see Appendix H for a listing of both classes).

***The Amendments provide requirements for the use, purchase, sale, and disposal of CFCs, including the provision for the mandatory phaseout of CFC production and use to avoid the long-term health risks posed by ozone depletion.***

### **332 CFCs and Refrigerants in Existing Buildings**

#### **332.1 Alternative Refrigerants**

For most air conditioning and refrigeration applications, HCFCs and HFCs are currently the only viable options for replacing CFCs. Exhibit 332.1 provides guidance for the selection of alternative refrigerants.

#### **332.2 Recovery and Recycling**

The field director, operations support, is responsible for recovering and recycling CFCs and HCFCs in existing systems to prevent their release and ensure reuse. The release of CFCs and HCFCs will be prohibited by July 1, 1992. The field director, support



Use	Current	ODP	Future	ODP
Unitary Air Conditioners	R-22 (HCFC)	0.05	R-22	0.05
Chillers	R-11 (CFC)	1.0	R-123 (HCFC)	0.02
	R-12 (CFC)	1.0	R-134a (HCFC)	0
	R-113 (CFC)	0.08	R-22 (HCFC)	0.05
	R-22 (HCFC)	0.05		
Commercial/Industrial	R-12 (CFC)	1.0	R-134a (HCFC)	0
Refrigeration	R-502 (CFC)	0.74	R-22 (HCFC)	0.05
	R-22 (HCFC)	0.05	Ammonia	
	Ammonia		New blends	

### Exhibit 332.1, Guidance for Selecting Alternative Refrigerants

services, is responsible for ensuring that recovery and recycling policies are observed by contractors.

#### 332.3 Repair and Maintenance

The Headquarters Office of Maintenance Management will provide technical information to the field about refrigerants in existing equipment and about appropriate testing, repair, alteration, and maintenance procedures as it becomes available. Support Services offices in each field division and the Office of Maintenance Management must develop repair, maintenance, and disposal programs for CFC-containing building systems that comply with the Amendments. All alternatives to and new procurements for HVAC systems must consider HCFC and HFC refrigerants or other appropriate alternatives. Safety and health considerations of new refrigerants must be coordinated with the Headquarters Office of Safety and Health.

#### 333 HVAC Systems in New Buildings

The Headquarters Office of Design and Construction (ODC) will provide information to the field regarding HVAC systems for new construction. It is the policy of ODC to ensure that new facilities are designed with heating and air-conditioning equipment and systems that use Class II substances (having an ODP of 0.05 or less) or substances that are compatible with Class II substances until other alternatives are available. Consideration must be given to systems that can be converted to environmentally safe refrigerants, systems that contain the most viable and environmentally safe refrigerants currently available, and the types of replacement refrigerants available in the future.

#### 334 Acquisition and Disposal of Existing Facilities

The real estate division in each facilities service center must ensure that any "due diligence" investigation (environmental/hazardous



material audits) conducted at existing facilities proposed to be utilized for Postal Service purposes includes an evaluation of the HVAC systems for the presence of CFCs. Similarly, any environmental audits of real estate being considered for disposal should disclose the presence of HVAC systems containing CFC refrigerants.

### **335 Halons**

The Amendments classify the halogenated fire extinguishing agents Halon-1211 and Halon-1301 as Class I substances. ODC is currently recommending water sprinkler systems as the environmentally and occupationally safe alternative, pending the development of other alternative substances. With halon substances being phased out of production, no new halon systems should be installed. The field director, operations support, must ensure that existing systems are maintained to be leakproof. The Headquarters Office of Maintenance Management will develop and provide the field facilities further guidance for the testing, repair, alteration, and maintenance of existing halon systems.

### **336 Other Class I and II Chemicals**

The field division director of support services, together with postal procurement policy and procedures and postal environmental policy, must consider the procurement of alternatives to Class I and II substances whenever possible.

## **340 Facility Design**

### **341 General**

Because of the Amendments, the planning and siting of future postal facilities must consider activities that can reduce automotive emissions, such as parking arrangements, access to public transportation, elimination of drive-up windows, and vapor recovery for gasoline-dispensing systems. In addition, the need for permits for stationary sources will also need to be addressed. Further clarification of the procedures governing the development of carpooling and mass transit options within the NEPA process can be found in Handbook RE-6, *Facilities Environmental Handbook*.

### **342 Parking**

In the most significant (serious, severe, and extreme) CO and ozone nonattainment areas, vehicle trips will likely be reduced by the implementation of trip reduction plans by transportation coordinators. These plans will affect employee commuting patterns and may reduce the number of parking spaces at new postal facilities. The field division director of support services must consider providing secure lockers for bicycles and, for vanpools and buspools, parking spaces that are closer to the buildings.

### **343 Access to Public Transportation**

The field director, human resources, should emphasize access to public transportation in new facility siting in nonattainment areas. Where public transportation is not available, shuttle buses or similar transportation should be considered by the Postal Service in

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***The planning and siting of future postal facilities must consider activities that can reduce automotive emissions, such as parking arrangements, access to public transportation, elimination of drive-up windows, and vapor recovery for gasoline-dispensing systems.***

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nonattainment areas. The facility service centers can play an instrumental role in the development of mass transit and carpooling options during the NEPA process.

#### **344 Drive-up Windows**

Drive-up windows may be banned in some ozone nonattainment areas. The design project manager and/or architect/engineer must carefully consider this factor in cases where drive-up windows are being planned.

#### **345 Gasoline Dispensing Systems**

Future installations of gasoline-dispensing units in moderate, serious, severe, and extreme ozone nonattainment areas (see Appendix D) are required to have stage II vapor recovery systems. Refer to Management Instruction AS-510-88-14, Underground Storage Tank Management, and Management Instruction AS-510-92-6, Minimum Requirements for Specifications of Underground Storage Tank Systems (see Appendix L), or contact the underground storage tank coordinator at the nearest facilities service center for further information. (See also Chapter 2, section 236.)

#### **346 Stationary Sources**

Permits must be obtained early in the design process for stationary sources planned for new facilities. This function will be coordinated between the Facilities Department and the design architect/engineer firm.

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***Permits must be obtained early in the design process for stationary sources planned for new facilities.***

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### **350 Indoor Air Quality**

#### **351 General**

Although indoor air pollution is not addressed in the Amendments, indoor pollutants that may be or are discharged into the ambient air are regulated. The most notable of these is friable asbestos, which is the subject of a major postal program (see below), and a second pollutant of serious concern is volatile organic compounds (VOCs).

#### **352 Asbestos Program**

Policy and procedures related to the Postal Service asbestos program are published in Management Instruction EL-810-91-6, Asbestos-Containing Building Materials Control Program (see Appendix M). For further information, contact the designated asbestos coordinators at the divisions, who oversee operational maintenance programs, inspections, and so forth, and the asbestos coordinators at the nearest facilities service centers, who manage abatement activities. There is also expertise at the human resources service centers (safety and health sections).

#### **353 VOCs**

Common VOCs include isopropyl alcohol, kerosene, methanol, and chlorinated solvents such as xylenes, toluenes, ketones, and aliphatics. The Amendments have expanded the list of controlled substances (see Appendix G). VOC emissions can be controlled by catalytic or thermal incineration or cooler condenser systems.





### 354 Other Indoor Air Pollutants

The Occupational Safety and Health Administration (OSHA) is primarily responsible for developing regulations to maintain the safety of the work environment, including clean air within the workplace. In the future, OSHA will likely develop regulations for "nontraditional" occupational contaminants, including chemical agents, bioaerosols, passive tobacco smoke, and radon. Contact the human resources service centers, the Office of Safety and Health at Headquarters, or the division manager, safety and health services, for further information in this area. OSHA has identified the following five sources of indoor air pollution:

- a.* Sources of pollution outside of building—contaminated ambient air and radon.
- b.* Nearby sources of pollution—vehicle garages, loading platforms, and nearby roads.
- c.* Building equipment—contaminated HVAC systems and office equipment (such as copying equipment and laser printers).
- d.* Human activities—smoking, housekeeping and maintenance activities, and pest control.
- e.* Building components and furnishings—off-gassing from new furniture and carpets.





## Chapter 4 Human Resources

### 410 General

The Amendments may affect postal employees in several different ways. Because certain localities may restrict the use of personal vehicles, a variety of approaches may be used to comply with the Amendments, such as alternate means of getting to and from workplaces, the reduction of parking opportunities at existing and future postal facilities, and the designation of employees as facility transportation coordinators. The key to making these approaches successful is early involvement of the unions, management associations, and other employee groups. If any proposed air pollution compliance plans are expected to affect Local Memorandums of Understanding (LMU), the division environmental coordinator (DEC) must involve the field director of human resources early in the planning. The issues related to trip reduction must be provided to the appropriate local labor management committee before any plan is submitted to the controlling air quality management district.

### 420 Alternative Commuting Modes

#### 421 General

##### 421.1 Background

Because automobile use will continue to be discouraged in the future, especially single-occupant vehicles used for morning and afternoon peak period commuting, localities may encourage numerous alternate commuting modes. Alternative modes include carpooling or vanpooling, buspooling, public transit, bicycling, and walking. Localities may seek the implementation of financial incentives and/or disincentives to encourage the use of these alternate modes of commuting. (For examples, see Appendix N.) It is important to realize that local regulators are often reluctant to mandate particular alternate commuting options; they prefer to recommend a menu of options that provides compliance flexibility to the employer.

##### 421.2 Responsibilities

The responsibilities for various tasks involved in the area of alternative commuting modes are as follows:

- a. The DEC must work closely with facility managers, operations managers, the field director of human resources, and facility transportation coordinators to implement alternate commuter strategies.
- b. The field division general manager/postmaster and DEC will develop the overall incentive and implementation strategies for alternative transportation.
- c. Local ordinances may require site transportation coordinators at individual facilities (typically, those with more than 100 employees), and such coordinators will need to receive initial and annual refresher training. The site transportation coordinator

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***If any proposed air pollution compliance plans are expected to affect Local Memorandums of Understanding (LMU), the division environmental coordinator must involve the field director of human resources early in the planning. The issues related to trip reduction must be provided to the appropriate local labor management committee before any plan is submitted to the controlling air quality management district.***

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- will be responsible for monitoring progress toward achieving the average vehicle ridership goals established by the local ordinance and stewardship of the employee financial incentive.
- d. The Headquarters Labor Relations Department must be involved in the evaluation of responses to local regulators to determine whether options are mandated or optional because of their potential impacts on labor agreements.

#### **422 Carpooling and Vanpooling**

Carpooling and vanpooling can make an important contribution toward achieving trip reduction goals. In most cases, carpooling consists of two or more people sharing a ride to or from work. Vanpooling is seven or more commuting to work in a van. Preferential parking for carpool or vanpool participants is an effective strategy to encourage ridesharing. The DEC and transportation coordinator, with assistance from the regional environmental steering committee, will develop other such strategies. The field director of human resources must be involved in these initiatives.

#### **423 Buspooling**

Buspooling is an option that may be considered if there are large numbers of employees who commute long distances (usually 30 miles or more each way) from the same general home area or along a similar route. In a buspool, 16 to 45 riders (typical bus capacities) travel to a common destination aboard a privately arranged and independently operated commuter bus. Strategies to promote buspooling include marketing the programs to the appropriate audiences and establishing convenient remote "park-and-ride" lots.

#### **424 Public Transit**

Public transit, such as rail transit systems, express bus service, and commuter rail systems, usually attract commuters who live long distances from their workplace. To encourage transit usage, the Postal Service could provide transit information centers, bus shelters, or the on-site sale of transit passes. Groups of employers can also pool together to provide a shuttle bus to a nearby commuter rail station or transit center.

#### **425 Bicycling and Walking**

For employees who live within a reasonable distance from their workplace, bicycling and walking are options. Both add little to traffic congestion and do not pollute the air. The concept can be promoted with multiple purposes—energy and environmental benefits and the health of employees.

#### **426 Transportation Allowance**

Because many employees who drive to work receive a financial benefit in the form of free parking, employees who do not drive often do not receive a benefit of equal value. An employee transportation allowance enables employees to choose how they wish to get to the workplace. All employees would be given a dollar amount that they can use, whether they choose to drive alone, park,



carpool, take public transit, or bicycle. Driving alone would become a poor economic choice to more and more commuters when they see less expensive commuting options open to them.

## **430 Parking Management**

### **431 General**

The DEC and transportation coordinator must coordinate all air pollution compliance plans involving changes in existing postal parking plans with the field director of human resources, the affected facility postmaster and union representative, and any parties involved in the compliance plan process. Local union agreements control parking for employees at postal facilities. Communities with significant ozone and CO problems will eventually restrict the free parking spaces available for employees. Several possible approaches to parking management exist in various communities, including:

- a. Decreasing the limits of parking spaces for offices and industrial buildings.
- b. Locating remote parking away from congested areas that promote shared modes of transportation—for example, park-and-ride facilities.
- c. Creating activity center parking plans that include shared parking use as a part of mixed-use development and better management of all parking resources.
- d. Developing park-and-ride lots that promote the transfer from solo driving to shared modes of transportation and promoting site designs that will attract commuters to use the facility and that are accessible to multimodal transportation.

## **432 Preferential Parking**

### **432.1 General**

Preferential parking for carpools and vanpools is based on the premise that people prefer convenient parking and will rideshare to get it. Preferential parking gives ridesharers a qualitative advantage over solo drivers by assigning them more desirable parking spaces.

### **432.2 When to Use Preferential Parking**

Preferential parking works best when sufficient parking spaces and convenient building accesses are not available. Many worksites have large parking lots that require employees to take as much as five to fifteen minutes to walk from their cars to the office. In these cases, preferential parking is effective in encouraging them to rideshare.

### **432.3 How to Use Preferential Parking**

Preferential parking can take many forms. Overall, it is any technique that enhances the appeal of workplace parking, such as locating parking spaces near building entrances, providing priority or exclusive access and egress to a garage or lot, offering priority position on waiting lists, putting names on parking spaces, and providing assigned spaces (while letting others fend for themselves). Such preferential treatment could be extended to include

desirable parking areas for bicycles. Safe and conveniently located bicycle parking can be an incentive to employees considering bicycling to work.

#### **433 Parking Pricing**

Free and abundant parking is an invitation to drive alone. As parking management policies are considered, the involvement of the Headquarters Human Relations Department is mandatory.

### **440 Trip Reduction Programs**

#### **441 General**

To control ozone and carbon monoxide (CO), many air quality management districts have implemented or are beginning to consider strategies to limit the number of vehicles on roadways, especially during the morning and afternoon peak periods. The Postal Service's experience with various controls indicates that such agencies set general transportation goals and allow individual organizations a certain amount of flexibility in meeting them. In severe and extreme ozone and serious CO nonattainment areas, states must adopt a trip reduction program requiring employees to reduce work-related vehicle trips and miles traveled. In Title I, sections 103 and 104, the Amendments require that "... each employer of 100 or more persons in such area increase average passenger occupancy per vehicle in commuting trips between home and the workplace during peak travel periods by not less than 25 percent above the average vehicle occupancy for all such trips in the area. . . ." Each employer that is subject to this requirement must submit a compliance plan within two years of the state's submission of the revised state implementation plan. The employer's compliance plan must convincingly demonstrate that compliance with this provision will be attained within four years of submission of the revised state implementation plan.

***To control ozone and carbon monoxide, many air quality management districts have implemented or are beginning to consider strategies to limit the number of vehicles on roadways, especially during the morning and afternoon peak periods.***

#### **442 Trip Reduction Measures—Miscellaneous**

Variable work hours and telecommuting (working at home) are additional measures that state and local agencies are recommending to achieve trip reduction by air quality management districts. (It must be noted that the Postal Service does not specifically allow these measures at this time; further guidance on these measures will be provided by field division directors of human resources.)

#### **443 Guidelines**

##### **443.1 General**

The Postal Service's experience with trip reduction plans suggests that they affect many organizational activities. (Appendix N contains further discussion on trip reduction plans and a sample plan from southern California.) The following factors must be considered in the development of any plans: labor and employee relations, postal operations, and vehicle fleet operations.



**443.2 Labor and Employee Relations**

Because of the potential impact on labor relations and Local Memorandums of Understanding (LMU), the field division director of human resources has the responsibility of coordinating the clearance of all trip reduction plans. The field division director of human resources must present the trip reduction plans to the appropriate labor management committees for review and consultation before their submission to the controlling air quality management district.

**443.3 Postal Operations**

In terms of postal operations, the trip reduction plan must be coordinated with the field division director of operations support.

**443.4 Vehicle Fleet Operations**

In terms of fleet operations, the plan must be coordinated with the Delivery, Distribution, and Transportation Department. Contract delivery drivers may count as employees, and it is difficult to count their arrivals between 6:00 and 10:00 a.m. in their contracted vehicles.







## Chapter 5 Compliance and Inspection Strategies

### 510 General

The Postal Service is required by law to allow federal and state environmental authorities to inspect postal facilities to determine compliance with the Amendments. The development and implementation of effective strategies for preparing for and monitoring such inspections will take considerable lead time.

### 520 Compliance Strategies

#### 521 Determining Status

##### 521.1 Nonattainment Categories

The division environmental coordinator (DEC) must determine whether his or her postal facilities and operational areas fall into one of the categories listed in Exhibit 521.1. The decision will be forwarded to the regional environmental steering committee.

##### 521.2 Compliance Timetables

Appendices D, E, and F list each area or city in the categories shown in Exhibit 521.1. Each classification imposes different requirements and timetables for compliance (see Exhibit 521.2). The timetables include both planning and compliance activities. The nonattainment areas with the most serious air pollution problems receive more time for compliance than those areas whose status is less serious. At this time, greatest attention is being paid to the most serious nonattainment areas; however, because less serious nonattainment areas have less time to achieve compliance, planning and compliance activities must be initiated as soon as possible.

#### 522 Determining Planning Needs

##### 522.1 General

After a facility's status has been determined, the DEC must contact the local, regional, and/or state air quality control agency to obtain more specific compliance requirements. The determination must be forwarded to the regional environmental steering committee. The DEC should determine whether expert assistance is needed to prepare compliance plans. Those who prepare plans must be knowledgeable about controls that may adversely affect postal operations and the movement of mail, as well as about local regulations. The plans should generally be divided into the three broad categories described below and should be reviewed by the regional environmental steering committee.

##### 522.2 Transportation Emissions

Controls on air pollution sources imposed by local, regional, and/or state air quality authorities are far ranging. Vehicles are the primary source of pollution in ozone and CO nonattainment areas. The Postal Service's compliance experience with various controls indicates that air quality pollution boards set general transportation

#### Ozone Nonattainment

- Marginal
- Moderate
- Serious
- Severe
- Extreme

#### Carbon Monoxide Nonattainment

- Moderate
- Serious

#### Particulate Matter (PM-10) Nonattainment

- Classified as moderate at this time

### Exhibit 521.1, Nonattainment Categories



Compliance Requirement	Category Year <sup>a</sup>
<b>Ozone</b>	
Marginal	1993
Moderate	1996
Serious	1999
Severe	2005-2007
Extreme	2010
<b>Carbon Monoxide</b>	
Moderate	1995
Serious	2000
<b>Particulate Matter (PM-10)<sup>b</sup></b>	
Moderate	1993

<sup>a</sup>Compliance with the Amendments must be obtained by the end of the year shown. States have the authority to accelerate the compliance dates.

<sup>b</sup>All PM-10 nonattainment areas are classified as moderate at this time.

### Exhibit 521.2, Attainment Deadlines for Ozone, Carbon Monoxide, and Particulate Matter (PM-10)

performance standards that allow individual organizations flexibility in complying with them. For example, employer-based trip reduction ordinances designed to reduce the prevalence of single-occupant morning commuter vehicles are in place in much of southern California. (Section 440 in Chapter 4 and Appendix N discuss trip reduction strategies.) Other strategies for reducing transportation emissions in nonattainment areas are as follows:

- a. Converting vehicle fleets to alternative fuels (see section 233 of this handbook).
- b. Using reformulated fuels (see section 234).
- c. Establishing emission inspection and maintenance programs (see section 235).
- d. Installing stage II vapor recovery nozzles on fuel-dispensing equipment (see sections 236 and 345).

#### 522.3 Stationary Sources

Stationary sources are fixed sources of air pollution emissions. The DEC should compile an inventory of all stationary sources covered by local and regional regulations. Local regulations may include requirements for permit applications, monitoring and reporting requirements, and permit fees. The types of sources regulated vary, depending on existing local air quality. Postal Service stationary sources include equipment such as, but not limited to, boilers, spray paint booths, and solvent cleaning tanks.

#### 522.4 Ozone-Depleting Substances

The Amendments mandate that ozone-depleting substances, primarily CFCs used as refrigerants, be phased out of production and

***The Postal Service is required by law to allow federal and state environmental authorities to inspect postal facilities to determine compliance with the Amendments.***

use. The DEC must review Postal Service activities and projects in terms of their consistency with the new requirements. Section 330 provides further guidelines about the use of ozone-depleting substances.

## 530 Inspection Strategies

### 531 General Policy

Of the many activities involved in following this policy, managing an environmental inspection is one of the most important. Field division general manager/postmasters must understand the requirements and implement procedures for conducting or preparing for inspections in conjunction with postal policy published in *Administrative Support Manual 550*, Environmental Management. Because the violation of certain environmental regulations can result in fines and/or imprisonment, all postal employees must be aware of their roles and responsibilities to comply with environmental laws before inspections. *If any manager at a postal facility verbally agrees to a visit by an inspector, regardless of whether the manager has the authority to do so, the Postal Service has granted permission for the inspection.* In postal-owned or -leased facilities, it is the responsibility of the Postal Service to ensure compliance with EPA and state environmental agency requirements. In leased facilities, this responsibility continues regardless of lease arrangements. The following sections provide background and guidance to help all employees manage an inspection with minimal time and trouble. The guidelines apply to all facilities in which postal employees work.

### 532 Regulations Governing Inspections

Exhibit 532 describes federal and state environmental laws, regulations authorizing agencies to inspect facilities, and five areas of concern for which inspections occur. Postal facilities may be subject to civil penalties of up to \$25,000 per day for willful neglect of environmental regulations.

### 533 Authority to Grant Access

It is postal policy to maintain safe and healthful working conditions and to cooperate fully with EPA and state environmental agency inspectors. Therefore, upon presenting appropriate credentials, EPA and state environmental agency inspectors will be permitted to enter, without delay, any postal facility for inspection or investigation purposes. The senior postal official, or designee, must review all EPA and state environmental agency credentials and may request verification from the local EPA or state agency office. If the credentials are in order, entry need not be delayed.

### 534 Types of Inspections

EPA conducts inspections primarily in five substantive areas (hazardous waste, toxic substances, water, air, and working environment; see Exhibit 532) in conjunction with either state agencies or OSHA. (For a description of OSHA inspections, refer to the *Employee and Labor Relations Manual 826*.) State agencies and OSHA may also conduct inspections independent of EPA. The

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***If any manager at a postal facility verbally agrees to a visit by an inspector, regardless of whether the manager has the authority to do so, the Postal Service has granted permission for the inspection.***

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***Postal facilities may be subject to civil penalties of up to \$25,000 per day for willful neglect of environmental regulations.***

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Regulation	Permit Requirements	Inspection Frequency	Areas of Concern
Resource Conservation and Recovery Act	Part A or Part B if facility stores hazardous waste for more than 90 days. A small quantity generator (100 to 1,000 kg of waste per month) can store without a permit up to 6,000 kg of waste for 180 days to accumulate a quantity for shipment or treatment.	Biennially or annually	<p>Regulates generation, storage, treatment, and disposal of hazardous waste.</p> <p>Inspector will check stacking of drums; damage to tanks; lighting; security; evidence of spillage and spill control equipment; spill containment; location of waste's origin; temporary storage location, particularly to see if it is sited on an impervious surface; waste manifests to check waste movement and handling (manifests must be kept on-site for three years); postal employees' training records for handling hazardous wastes; and the facility's contingency plan (including the emergency and spill response plans).</p>
Toxic Substances Control Act	This type of inspection requires 30 days written notice from the regulatory agency.	Periodically	<p>Regulates use, handling, and disposal of PCBs and asbestos.</p> <p>All facility areas containing asbestos must be marked and workers coming into contact trained. Electrical transformers and capacitors with 500 ppm or greater of PCBs must be properly labeled, placed in contained area when no longer in use, and inspected regularly. Inspection logs must be signed, dated, and kept on-site, and training programs and spill response plans must be available.</p> <p>Notice of violation will be issued if facility is unable to document contents of electrical equipment.</p>
Clean Water Act	National Pollution Discharge Elimination System (NPDES) permit must be obtained to allow discharge of waste water into water bodies.	Periodically	<p>Regulates discharge of pollutants into water bodies, including wetlands.</p> <p>Inspector will conduct a walkthrough to review facility operations and processes, check wastewater outfalls and monitoring equipment, inspect traps and drains, review monitoring reports, and may also sample waste water; if samples are taken, split them with the inspector and arrange for an independent laboratory analysis to verify the agency's analytical results. Use a state-certified lab to test samples and retain monitoring reports and test results for at least three years.</p> <p>Notice of violation may be issued if facility fails to notify state agency or EPA about changes in discharge content.</p>
Clean Air Act	No requirements for small to medium-sized facilities presently; contact state, regional, and federal (EPA) agencies to verify permit status and requirements.	Usually conducted annually	<p>Regulates amount of pollutants in ambient air and for emissions from stacks.</p> <p>Inspection for stationary sources is typically visual. If an opacity limit exists, inspector may take a smoke reading to determine if limits have been exceeded. A log noting equipment downtime should be located near monitoring stations. Other sampling techniques will be implemented as inspection activities increase in response to the latest amendments to the Clean Air Act. Employees must not tamper with emission control equipment on vehicles.</p> <p>Citation for violation of the Clean Air Act may be issued if facility emission limits are exceeded or facility fails to notify EPA of changes in equipment or processes.</p>
Occupational Safety and Health Administration	See <i>Employee and Labor Relations Manual</i> , section 826.	Periodically	<p>Regulates worker safety in a wide range of areas, from the lighting of exit signs to slope angles of excavations.</p> <p>See <i>Employee and Labor Relations Manual</i>, section 826, for all directives concerning pertinent OSHA regulations.</p>

three types of inspections are (1) those determining compliance with permits, (2) those resulting from a regulatory agency's suspicion that violations have occurred, and (3) those resulting from employee complaints. Managers must be cooperative and not delay or impede inspectors from OSHA or environmental agencies.

### 535 Noncompliance

The most critical factors of determining the degree of penalty for noncompliance are intent, length of time a facility is in noncompliance, and extent of contamination. If an environmental problem is recent and the Postal Service can show evidence that it was accidental or took immediate action to eliminate or correct it, the regulatory agency may issue a Notice of Violation (NOV) without a fine. If the noncompliance problem existed for several months or years or it was intentional, the agency may issue NOVs, fines, and/or remediation orders. If the extent of contamination is limited to the site and has not adversely affected neighbors or the environment, regulators are usually reasonable when negotiating a cleanup schedule. If, however, contaminants have affected the public or the environment, remediation orders, fines, or civil suits may result. (See Appendix C for further discussion.)

### 536 Procedures for Managing the Inspection Process

#### 536.1 General

**.11 EPA Resources.** For additional information on the two manuals discussed in the following subsections, contact the nearest EPA regional office or the Environmental Management Division at Headquarters.

**.111 Generic Protocol for Environmental Audits at Federal Facilities.** EPA developed this publication to provide step-by-step instructions to help federal agencies design protocols for internal environmental audits at federal facilities and tools to collect field-level compliance data once a program is in place. It is useful for all federal agencies in all stages of audit program development; however, it may need to be supplemented to meet the complex needs of individual agencies. The document covers the following topics: air, asbestos, drinking water, water pollution, nonhazardous solid waste, hazardous waste, underground storage tanks, past disposal of hazardous materials, emergency planning and community right-to-know, polychlorinated biphenyls (PCBs), pesticides, radioactive materials, environmental noise, natural resources, cultural resources, environmental impact documentation, and environmental management systems. The first two chapters discuss the purpose, scope, and organization of the protocol and outline audit activities. The chapters have seven subparts: federal statutes, applicability, regulatory scope, state and local regulatory authority, selected management considerations, an agency policy audit information source list (Exhibit 536.111a), and an auditors' air quality checklist (Exhibit 536.111b). DEC's or contractors may use these lists. There are also several detailed technical appendices. Primarily, federal environmental statutes are covered.

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***The field division general manager/postmaster has primary responsibility for all inspections conducted at division facilities.***

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**Activity: Air****Records to Review**

- ☐ State and local air pollution control regulations
- ☐ Agency air pollution control regulations
- ☐ Emissions inventory
- ☐ All air pollution source permits
- ☐ Plans and procedures applicable to air pollution control
- ☐ Emission monitoring records
- ☐ Opacity records
- ☐ Notifications of violations to regulatory authorities
- ☐ Instrument calibration and maintenance records
- ☐ Reports/complaints concerning air quality
- ☐ Air Emergency Episode Plan
- ☐ State and/or federal regulatory inspections

**Physical Features to Inspect**

- ☐ All air pollution sources
- ☐ Air pollution monitoring and control devices
- ☐ Air emission stacks
- ☐ Air intake vents

**People to Interview**

- ☐ Operators of sources
- ☐ Stack testers
- ☐ Maintenance personnel
- ☐ Records clerks

Facility: _____		Auditor: _____		Date: _____	
Regulatory Citation	Auditor's Checklist	Comments	Finding Number		
40 CFR 51 and 52/State Regulations	<input type="checkbox"/> <b>State Implementation Plans</b>  Authority to enforce the requirements pursuant to the Clean Air Act has been delegated to the states. The facility should be aware of and comply with state air pollution control regulation. A current copy of the state air pollution control regulations should be on site.				
40 CFR 60	<input type="checkbox"/> <b>New Stationary Source Performance Standards</b>  Any federal facility with a source listed in Appendix D of this document that has been constructed/modified subsequent to the "proposal date" also listed in Appendix D complies with the following applicable standards set forth in the federal and/or state regulations:				
	<input type="checkbox"/> The appropriate regulatory authority (i.e., state agency) is notified of construction, reconstruction, initial startup, physical or operational change that results in an increase in the emission rate, opacity observation information, and excess emissions.				
	<input type="checkbox"/> A report is prepared showing the results of performance test within 180 days after initial startup.				
	<input type="checkbox"/> Facility maintains monitoring systems and monitoring devices required for specific source category.				
	<input type="checkbox"/> Facility complies with emission standards for regulated pollutants such as sulfur dioxide, particulate matter, carbon monoxide, ozone, nitrogen dioxide, and lead.				
	<input type="checkbox"/> Facility monitors operations and maintains records of operations as required for specific source category.				

Regulatory Citation	Auditor's Checklist	Comments	Finding Number
	<input type="checkbox"/> Reference test methods and procedures are used as required for specific source category.		
40 CFR 61/State Regulations	<input type="checkbox"/> <b>National Emission Standards for Hazardous Air Pollutants (NESHAP):</b> States have the authority to implement and enforce national emission standards for hazardous air pollutants. A copy of the state air pollution control regulations should be on site.		
61.08/State Regulations	<input type="checkbox"/> Facility obtains approval from appropriate regulatory authority (i.e., state agency) prior to constructing/modifying stationary source potentially emitting hazardous air pollutant(s).		
61.09/State Regulations	<input type="checkbox"/> The appropriate regulatory authority is notified prior to startup of source potentially emitting hazardous air pollutant(s).		
61.12/State Regulations	<input type="checkbox"/> Facility operates source in a manner consistent with good air pollution control practices for minimizing emissions.		
61.14/State Regulations	<input type="checkbox"/> Emission tests are performed as required by applicable regulations and/or permit requirements.		
61.14/State Regulations	<input type="checkbox"/> Facility operates monitoring system in a manner consistent with good air pollution control practices for minimizing emissions.		
State/Local Regulations	<input type="checkbox"/> Emissions of the following pollutants do not exceed limitations set forth in state or local regulations: <ul style="list-style-type: none"> <li>- Asbestos</li> <li>- Benzene</li> <li>- Beryllium</li> <li>- Coke oven emission</li> <li>- Inorganic arsenic</li> <li>- Mercury</li> <li>- Radionuclides</li> </ul>		

Exhibit 536.111b (p. 2), Air Quality Checklist



**.112 Environmental Audit Program Design Guidelines for Federal Agencies.** EPA also developed this companion document to help personnel assemble a workable environmental auditing program. The publication will be especially useful when designing a new auditing program.

**.12 Auditing Checklists.** Federal regulatory citations provided in the auditors' checklists may have exceptions too lengthy and site-specific to list in full; auditors must verify the need for compliance with such regulations with the *Code of Federal Regulations* (environmental regulations are contained in Title 40). (However, it should be noted that the *Code of Federal Regulations* can be out of date. Therefore, the regional environmental steering committee should verify issues of concern with the appropriate federal, state, or local agency.) Checklists must be revised as necessary to reflect changes in environmental laws. In addition, relevant state and local regulations must be included in the audit program as appropriate. Appendix H lists federal and state environmental agencies and contacts.

### **536.2 Procedures**

The following procedures ensure appropriate postal authorization and optimize facility compliance.

#### **.21 Responsibilities**

**.211 Field Division General Manager/Postmaster.** The field division general manager/postmaster has primary responsibility for all inspections conducted at division facilities.

**.212 DEC.** The DEC must be knowledgeable about environmental affairs and inspection procedures and is responsible for designating a backup DEC at each management sectional center and bulk mail center. The DEC should receive all calls from environmental regulatory agencies and is authorized to grant permission to inspect a facility if the inspection will not infringe on the rights of the Postal Service or its employees.

**.22 Initial Contact.** Regulatory agencies normally request permission by phone to conduct inspections. The DEC or individual designated to handle the initial call should request 30 days advance notice of an intended inspection unless the inspection is in response to a complaint or suspected violation. If the regulatory agency does not accommodate the request for 30 days advance notice, some time period should be negotiated to allow for preparation and proper management review. The DEC should note that environmental inspections usually cover all areas of environmental operations. That is, typically, inspectors will not just evaluate air quality; they will also check the water, asbestos, hazardous waste, and so on, during the same inspection.

#### **.23 Pre-inspection of the Facility**

**.231 General Pre-inspection Procedures.** To determine whether their facilities or operations are in compliance *before* a formal inspection by a regulatory agency, DEC's must conduct a pre-inspection to review operations, read permits to identify obscure requirements, and identify report submission dates, scheduled monitoring, and previous inspections. In addition, DEC's must contact

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***The DEC must be knowledgeable about environmental affairs and inspection procedures and is responsible for designating a backup DEC at each management sectional center and bulk mail center.***

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federal and state agencies or the facility operations manager to ensure that the facility holds necessary permits or licenses and that there are no unresolved compliance issues.

**.232 Noncompliance Issues.** The DEC and/or the facility operations manager must resolve all noncompliance issues discovered during the pre-inspection. Either individual must document the steps taken to establish the Postal Service's intent to comply with environmental regulations. If noncompliance is based on lack of knowledge about regulations or high employee turnover rates, documentation should be prepared to explain the reasons for noncompliance and to develop a plan for bringing the facility into compliance. If noncompliance is a result of equipment leaks or malfunctions, the operations manager must either have the equipment fixed or work orders for repair developed as soon as possible.

**.233 Preliminary Remedial Plan.** If certain aspects of a facility's operations have not been in compliance with environmental regulations for more than several months, the DEC must develop a preliminary remedial plan that demonstrates the Postal Service's intent to comply before a formal environmental inspection takes place.

#### **.24 Information and Notification**

**.241 Information Needed.** When a regulatory agency calls to arrange for a formal inspection at a Postal Service facility, the DEC must (1) identify the type of inspection to take place, (2) find out who is coming and that person's level of expertise, (3) determine the reason for the inspection, and (4) request that the agency send a letter stating its intent to conduct an inspection, the legal basis for the inspection (compliance or special purpose), and exactly what information the facility should have available for review.

**.242 Notification.** Because civil, criminal, or tort liabilities may be involved, the DEC must immediately notify the field division general manager/postmaster, the regional environmental steering committee, the field counsel, and the Headquarters Environmental Management Division of the scheduled facility inspection.

**.25 Documentation.** The DEC must document all contact with the regulatory agency before, during, and after the inspection and provide copies to the field division general manager/postmaster, the field counsel, the regional environmental steering committee, and the Headquarters Environmental Management Division.

#### **.26 Participants, Planning, and Agenda**

**.261 Participants.** The field division general manager/postmaster should select the participants for facility environmental inspections. Normally, the DEC guides the inspector around the site. If the DEC is not available, the designated backup and a senior-level manager should guide the inspector. (The maintenance overhaul technical service center may be contacted for assistance.) If the DEC does not understand the critical engineering or operational elements of the system, the facility operations manager should also participate. All postal employees who participate in the formal

***Because civil, criminal, or tort liabilities may be involved, the DEC must immediately notify the field division general manager/postmaster, the regional environmental steering committee, the field counsel, and the Headquarters Environmental Management Division of the scheduled facility inspection.***

inspection should confer ahead of time, discussing clearly and precisely pertinent information about the facility or operation.

**.262 Upfront Planning.** The DEC should plan for inspections carefully by developing an agenda and proposed route for the inspection and having knowledgeable staff assigned along the route to answer questions. The inspector should be allowed the freedom to deviate from the route.

**.263 Agenda.** When the inspector arrives, the DEC or the backup person should introduce him or her to key employees who can respond to specific, technical questions. The inspector should receive the materials requested for review and learn the route established for the inspection. If an inspector stops to ask an employee a question, the individual conducting the tour should record the name of the staff person, the nature of the question, and the answer.

**.27 Samples.** If the inspector takes samples from the facility site, the DEC or backup must split the sample with the inspector and arrange for independent laboratory analysis to verify the inspecting agency's results. An EPA- or state-certified laboratory should be used to test the samples and the results kept on file for at least three years. (It is important that appropriate laboratories be contacted before the inspector arrives because many types of samples require special containers, handling procedures, and turnaround times.)

**.28 Debriefing Requested.** At the conclusion of the inspection, the DEC or backup must request a debriefing. If the inspector mentions violations, the inspector's assertions should be acknowledged, but the Postal Service representative should not agree or disagree. Plenty of time exists for contesting the issues in writing. Any requests for additional information should be double-checked during the debriefing.

#### **.29 Followup Actions**

**.291 General.** For most EPA and state environmental agency inspections, the formal report is mailed to the postal facility four to six weeks after the inspection. Postal management needs answers to three questions when reading the report: Can the information be used to improve operations, the environment, and the impact to human health? Are there violations noted? Are there any penalties imposed?

**.292 Notice of Violation (NOV).** Regulatory agencies may issue an NOV without a monetary penalty. Issuance of an NOV is a matter of public record. The Postal Service may appeal an NOV but must have enough reliable analytical data to back the appeal. Appeals are costly, particularly if extensive research, sampling, or outside environmental consultation is required. Before providing

the agency with any of the information, studies, and other items required by the NOV, the DEC must:

- a. Forward the entire package of data received from the agency to the field division general manager/postmaster, the regional environmental steering committee, and the field counsel for review (such review ensures that information about postal operations, procedures, policies, and practices is correct).
- b. Send a copy of the entire package to the Environmental Management Division at Headquarters.
- c. File a copy at the facility.

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***If fines are levied, no Postal Service employee should respond to the agency until the field counsel reviews documentation to determine whether the fine is valid.***

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**.293 Penalties.** If fines are levied, no Postal Service employee should respond to the agency until the field counsel reviews documentation to determine whether the fine is valid. The DEC must forward all relevant memorandums, letters, files, and data to the field counsel so that such documents become work papers. The field counsel is responsible for filing all appeals or settling quickly with the agency so that operations may proceed without delay. It is not unusual to reduce a fine substantially by appealing it if there are strong supporting data. The DEC, in consultation with the regional environmental steering committee, should initiate corrective action while waiting for final determination from the field counsel.

**.294 Followup Action Responsibility.** The regional environmental steering committee must authorize the DEC and facility operations manager to work together to schedule and complete all followup actions. The regional environmental steering committee is responsible for overseeing followup actions that improve operations and environmental conditions.

## Appendix A

### Management Instruction AS-550-91-11, Clean Air Act Compliance



# Management Instruction

<b>Title</b>  Clean Air Act Compliance	<b>Date Issued</b> 12/11/91	<b>Filing Number</b> AS-550-91-11
	<b>Effective Date</b> 12/11/91	<b>Obsoletes</b> N/A
	<b>Originating Organization &amp; OCC Code</b> Administrative Services Group (ASG) AS1	
	<b>Signature &amp; Title</b>  Mitchell H. Gordon Senior Asst. Postmaster General, ASG	

#### I. Purpose

This Management Instruction establishes a policy framework for complying with the Clean Air Act Amendments (hereafter, the Amendments), Public Law 101-549. Detailed procedures on how to comply with the Amendments will be published in Handbook AS-551, Clean Air Act Compliance, in early 1992.

#### II. Background

The Amendments were signed into law on November 15, 1990. They have a direct impact on the operations of the Postal Service because they set distinct provisions to ensure attainment and maintenance of the National Ambient Air Quality Standards in a broad range of areas, including stationary sources, mobile sources, and stratospheric ozone and global climate protection. The Amendments also include requirements for permits and authorize measures for enforcement.

#### III. Policy

The Postal Service, in accordance with policy published in *Administrative Support Manual 550*, Environmental Management, will comply with all aspects of the Amendments, including requirements imposed by state and/or regional air quality control agencies.

NOTE: States and local/regional air quality control agencies are responsible for issuing permits and enforcing air quality regulations. Because the Amendments waive sovereign immunity for federal agencies, the Postal Service must comply with state, regional, and local air pollution compliance plans.

Government environmental officials are entitled to conduct inspections for the purpose of ensuring compliance. They are also authorized to enforce the provisions of the Amendments, which include civil and criminal penalties.

#### IV. Scope

The policies and guidelines in this Management Instruction apply to all postal employees, programs, products, services, and contractors.

#### V. Responsibilities

##### A. General

The Postal Service is responsible for managing the emissions generated as a result of its operations.

##### B. Headquarters

1. *Senior Assistant Postmaster General, Administrative Services Group.* As the chief environmental officer for the Postal Service, this individual is responsible for overall policy and program development.

2. *Headquarters Environmental Steering Committee.* The Headquarters Environmental Steering Committee is chaired by the chief environmental officer and is composed of the following:

- a. APMG, Labor Relations Department
- b. APMG, Procurement and Supply Department
- c. APMG, Engineering and Technical Support Department

#### Distribution

All Headquarters units, Headquarters field units, Regions, Divisions, and Management Sectional Centers.

#### Special Instructions

Organizations listed under Distribution may order additional copies from material distribution centers. Use Form 7380, *MDC Supply Requisition*, and specify the filing number.

You may redistribute this document by photocopying it, but do not paraphrase or otherwise revise it.

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- d. Deputy General Counsel
- e. APMG, Government Relations Department
- f. APMG, Delivery, Distribution, and Transportation Department
- g. APMG, Controller Department
- h. APMG, Operations Systems and Performance Department
- i. APMG, Facilities Department
- j. APMG, Employee Relations Department
- k. APMG, Marketing Department

**3. Environmental Management Division, Administrative Services Group.** This division is responsible for developing policies and methods for compliance with the Amendments and will work with the Operations Support Group at Headquarters to ensure that national operations policies and methods are not adversely affected.

**4. Human Resources Group, Labor Relations Department.** This group is responsible for policies that affect employee working conditions, employee safety and health, and labor agreements.

**5. Operations Systems and Performance Department.** This department is responsible for the management of the Postal Service vehicle fleet, including the fleet's compliance with the provisions of the Amendments.

**6. Engineering and Technical Support Department.** This department is responsible for energy management at existing facilities in accordance with the Amendments.

**7. Facilities Department.** This department is responsible for the design and construction of new facilities in accordance with the provisions of the Amendments.

#### C. Regions

**1. Regional Postmaster General.** This individual has overall authority for postal operations at the regional level and has responsibility for selecting members of the regional environmental steering committee. The regional environmental steering committee reports significant findings to the regional postmaster general.

**2. Regional Environmental Steering Committees.** Within its region, each environmental steering committee is responsible for developing, tracking, monitoring, and providing program assistance at all levels of the field organization. In cases where several field divisions are included within the same air quality management district, it is the responsibility of the

committee to oversee the development of the air pollution compliance plans.

#### D. Divisions

##### 1. Field Division General Manager/Postmaster.

a. The field division general manager/postmaster has primary responsibility for ensuring compliance with applicable federal, state, and local air pollution laws. He or she must designate an environmental coordinator to oversee the division's environmental programs.

b. The field division general manager/postmaster must ensure that all fees related to supporting air pollution regulatory programs are paid from the operating budget of the affected facility and/or field division. All facility costs associated with Amendments compliance, except employee incentives, should be charged to account 56501. Employee incentives for Amendments compliance should be charged to account 56503.

**2. Division Environmental Coordinator.** The division environmental coordinator (DEC), as designated by the field division general manager/postmaster, is responsible for source registration, permit requirements (including fees), emissions testing, and the development of compliance plans. The DEC must provide copies of all compliance plans to his or her regional environmental steering committee. Also, the DEC should monitor all compliance activities, including facility inspections by air quality control agencies. The facility inspections should be coordinated so as to avoid disrupting postal operations or the safety of the mail.

## VI. Compliance Strategies

#### A. General

**1. Determining Status.** Effective compliance strategies will take considerable lead time and should be started as soon as possible. The DEC must determine whether his or her individual postal facilities and operational areas fall into one of the categories in the nonattainment areas listed below. A listing of each area and/or city for the categories is provided in Attachment A. Each of these categories imposes different requirements and timetables for compliance. (See Attachment B.) It is emphasized that the timetables include both planning and compliance activities and that nonattainment areas with the most serious air pollution problems are given more time for compliance than those nonattainment areas whose status is less serious. At this time, greatest attention is being paid to the most serious nonattainment areas; however, because less serious nonattainment areas have less time to achieve compliance, planning and

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compliance activities must be initiated as soon as possible.

a. Ozone nonattainment area categories are:

- (1) Marginal
- (2) Moderate
- (3) Serious
- (4) Severe
- (5) Extreme

b. Carbon monoxide nonattainment area categories are:

- (1) Moderate
- (2) Serious

c. All particulate matter (PM-10) nonattainment areas are categorized as moderate at this time.

**2. Determining Planning Needs.** After determining a facility's status, the DEC should contact the local, regional, and/or state air pollution agency to obtain more specific compliance requirements. He or she should determine whether expert assistance is needed to prepare compliance plans. Those who prepare plans must be especially aware of local regulations and ordinances that may adversely affect postal operations and the movement of mail. The plans will generally be divided into the following broad categories:

- a. Transportation emissions
- b. Stationary sources
- c. Ozone-depleting substances

**B. Inspections by Regulatory Agencies**

The Postal Service is required by law to allow federal and state environmental authorities to inspect postal facilities. General managers/postmasters must understand requirements and implement procedures for conducting such inspections in conjunction with general postal environmental policy published in *Administrative Support Manual 550*, Environmental Management.

**C. Transportation Emissions**

**1. General.** Controls on air pollution sources imposed by local, regional, and/or state air quality control

agencies are varied. Vehicles are the primary source of pollution in ozone and carbon monoxide pollution nonattainment areas.

**2. Strategies.**

- a. The Postal Service's compliance experience with various controls indicates that air pollution boards set general transportation performance standards that allow individual organizations flexibility in complying with them. The goal of most of these performance standards is to reduce the number of single-occupant vehicles and the emissions from them.
- b. A wide variety of options exists to reduce trips. However, the implementation of any of them must be carefully coordinated at the division level among the human resources director, the operations support director, and the managers of the affected facilities. Other strategies to reduce emissions will have direct impacts on fleet vehicles or ancillary support operations such as fueling facilities. These activities must be carefully coordinated with the Headquarters Office of Fleet Management and the field division general manager/postmaster.
- c. Air quality control agencies may also suggest alternate work strategies such as varying work hours or work-at-home arrangements. All changes in this area must be coordinated through the field division human resources director.

**D. Stationary Sources**

Stationary sources are fixed sources of air pollution emissions. Each division should compile an inventory of all stationary sources covered by local/regional regulations. Local regulations may include requirements for permit applications, monitoring and reporting requirements, and permit fees. The types of sources regulated vary depending on existing local air quality. The stationary sources in the Postal Service include boilers, spray paint booths, and solvent cleaning tanks.

**E. Ozone-Depleting Substances**

The Amendments mandate that ozone-depleting substances, primarily chlorofluorocarbons (CFCs) used as refrigerants, be phased out of production and use. Postal Service activities and projects must be reviewed for consistency with the new requirements. For example, building design must take into account the phase-out of existing refrigerants, such as R-11 and R-12.

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**VII. Available Resources**

The regional environmental steering committees are available to provide assistance for field divisions and can be contacted through the Office of the Regional Postmaster General.

**VIII. Related Directives**

The following documents provide additional information that may be relevant to the preparation of air pollution compliance plans:

- a. Fleet Management Bulletin V-17-91, "Chlorofluorocarbon (CFC) Recycling Policy"

- b. Management Instruction EL-810-85-5, "Friable Asbestos Containing Materials Control Program"
- c. Management Instruction AS-510-88-14, "Underground Storage Tank Management"
- d. Management Instruction AS-550-91-10, "Pollution Prevention Program"
- e. Handbook AS-550, *Recycling Guide*
- f. Handbook RE-6, *Facilities Environmental Handbook*





## Appendix B

### Glossary

**Acid Deposition ("Acid Rain").** A complex chemical and atmospheric phenomenon that occurs when emissions of sulfur and nitrogen compounds and other substances are transformed by chemical processes in the atmosphere, often far from the original sources, and then deposited on earth in either a wet or a dry form. The wet forms, popularly called "acid rain," can fall as rain, snow, or fog. The dry forms are acidic gases or particulates.

**Air Toxics.** Any air pollutant for which a National Ambient Air Quality Standard (NAAQS) does not exist (that is, excluding ozone, carbon monoxide, particulate matter, sulfur oxides, nitrogen oxides, and lead) that may reasonably be anticipated to cause cancer, developmental effects, reproductive dysfunctions, neurological disorders, heritable gene mutations, or other serious or irreversible chronic or acute health effects in humans.

**Aromatics.** A type of hydrocarbon, such as benzene or toluene, added to gasoline to increase octane. Some aromatics are toxic.

**Attainment Area.** An area considered to have air quality as good as or better than the National Ambient Air Quality Standards as defined in the Clean Air Act. An area may be an attainment area for one pollutant and a nonattainment area for others.

**Best Available Control Measure (BACM).** A term used in the Amendments referring to the "best" measures (according to EPA guidance) for controlling small or dispersed sources of particulate matter, such as roadway dust, wood stoves, and open burning.

**Carbon Monoxide (CO).** A colorless, odorless gas that is toxic because of its tendency to reduce the oxygen-carrying capacity of the blood.

**Clean Coal Technology.** Any technology not in widespread use as of the date of enactment of the Clean Air Act Amendments that will achieve significant reductions in pollutants associated with the burning of coal.

**Clean Fuels.** Blends and/or substitutes for gasoline fuels, including compressed natural gas, ethanol, methanol, and others.

**Coke Oven.** An industrial process that converts coal into coke, which is one of the basic materials used in blast furnaces for the conversion of iron ore into iron.

**Cold Temperature CO.** A standard for automobile emissions of carbon monoxide (CO) to be met at a low temperature (that is, 20 degrees F). Conventional catalytic converters are less efficient upon startup at low temperatures.

**Control Techniques Guideline (CTG).** Guidance documents issued by EPA that define reasonably available control technology (RACT) to be applied to existing facilities that emit certain threshold quantities of air pollutants. They contain information on the economic and technological feasibility of available techniques.

**CFCs (Chlorofluorocarbons).** A family of inert, nontoxic, and easily liquefied chemicals used in refrigeration, air conditioning, packaging, or insulation or as solvents or aerosol propellants. Because CFCs are not destroyed in the lower atmosphere, they drift into the upper atmosphere, where the chlorine is released and destroys ozone.

**CFC-12.** A chlorofluorocarbon with a trademark name of Freon, commonly used in refrigeration and automobile air conditioning.

**Emission Control Diagnostics.** Computerized devices placed on vehicles to detect the malfunction of emissions controls and to notify the owner of the need for repair.

**Enhanced Inspection and Maintenance (Enhanced I&M).** An improved automobile inspection and maintenance program that includes, as a minimum, increases in coverage of vehicle types and model years, tighter stringency of inspections, and improved management practices to ensure more effectiveness. This may also include annual, computerized, or centralized inspections; under-the-hood inspections to detect tampering with pollution-control equipment; and increased repair waiver cost. The purpose of Enhanced I&M is to reduce automobile emissions by ensuring that cars are running properly.

**Federal Implementation Plan.** Under current law, a federally implemented plan to achieve attainment of an air quality standard, used when a state is unable to develop an adequate plan.



**Halons.** A family of compounds containing bromine used in fighting fires, whose breakdown in the atmosphere depletes stratospheric ozone.

**HCFCs.** Chlorofluorocarbons that have been chemically altered by the addition of hydrogen and that are significantly less damaging to stratospheric ozone than other CFCs.

**Inspection and Maintenance (I&M).** A program providing for periodic inspections of motor vehicles to ensure that emissions of specified pollutants do not exceed established limitations (see "Enhanced I&M").

**Low NO<sub>x</sub> Burners.** One of several combustion technologies used to reduce emissions of nitrogen oxides (NO<sub>x</sub>).

**Maximum Achievable Control Technology (MACT).** Emissions limitations based on the best demonstrated control technology or practices in similar sources to be applied to major sources emitting one or more of the listed toxic pollutants.

**Montreal Protocol.** An international environmental agreement to control chemicals that deplete the ozone layer. The protocol, which was renegotiated in June 1990, calls for a phaseout of CFCs, halons, and carbon tetrachloride by the year 2000 and a phaseout of chloroform by 2005 and provides financial assistance to help developing countries make the transition away from ozone-depleting substances.

**National Environmental Policy Act (NEPA).** Passed in 1969, this law declared a national policy to encourage productive and enjoyable harmony between humans and the environment, to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humans, to enrich the understanding of the ecological systems and natural resources important to the nation, and to establish the Council on Environmental Quality.

**Nonattainment Area.** An area in which one or more of the National Ambient Air Quality Standards is not met.

**NO<sub>x</sub> (Nitrogen Oxides).** Chemical compounds containing nitrogen and oxygen that react with volatile organic compounds in the presence of heat and sunlight to form ozone. They are also a major precursor to acid rain. Nationwide, approximately 45 percent of NO<sub>x</sub> emissions come from mobile sources, 35 percent from electric utilities, and 15 percent from industrial fuel combustion.

**Onboard Controls.** Devices placed on vehicles to capture gasoline vapors during refueling and then route the vapors to the engine when the vehicle is started so that they can be efficiently burned.

**Oxygenated Fuels.** Gasoline that has been blended with alcohols or ethers that contain oxygen to reduce CO and other emissions.

**Ozone.** A compound consisting of three oxygen atoms that is the primary constituent of smog. It is formed through chemical reactions in the atmosphere involving volatile organic compounds, nitrogen oxides, and sunlight. Ozone can initiate damage to the lungs and to trees, crops, and materials. There is a natural layer of ozone in the upper atmosphere that shields the Earth from harmful ultraviolet radiation.

**PM-10.** A new standard for measuring the amount of solid or liquid matter suspended in the atmosphere ("particulate matter"). Refers to the amount of particulate matter less than or equal to 10 micrometers in diameter. The smaller PM-10 particles penetrate to the deeper portions of the lung, affecting sensitive population groups, such as children and people with respiratory diseases.

**Reasonably Available Control Measures (RACMs).** A broadly defined term referring to technologies (including RACT) and other measures that can be used to control pollution. In the case of PM-10, this refers to approaches for controlling small or dispersed source categories, such as road dust, wood stoves, and open burning.

**Reasonably Available Control Technology (RACT).** An emission limitation on existing sources in nonattainment areas, defined by EPA in a Control Techniques Guideline (CTG) and adopted and implemented by states.

**Reformulated Gasoline.** Gasoline with a different composition from conventional gasoline (for example, lower aromatics content) that results in the production of lower levels of air pollutants.

**Repowering.** The replacement of an existing coal-fired boiler with one or more clean coal technologies, to achieve significantly greater emission reduction relative to the performance of technologies in widespread use as of the enactment of the Clean Air Act Amendments of 1990.



**Residual Risk.** The quantity of health risk remaining after application of the MACT (Maximum Achievable Control Technology).

**Sanctions.** Actions taken against a state or local government by the federal government for failure to plan or implement a state implementation plan. Examples include the withholding of highway funds and a ban on construction of new sources.

**Stage II Controls.** Systems placed on service station gasoline pumps to control and capture gasoline vapors during automobile refueling.

**State Implementation Plan.** A document prepared by a state and submitted to EPA for approval that identifies actions and programs to be undertaken by the state and its subdivisions to implement their responsibilities under the Clean Air Act Amendments of 1990.

**Sulfur Dioxide (SO<sub>2</sub>).** A heavy, pungent, colorless air pollutant formed primarily by the combustion of fossil fuels. It is a respiratory irritant, especially for asthmatics, and is the major precursor to the formation of acid rain.

**Transportation Control Measures (TCMs).** Steps taken by a locality to adjust traffic patterns (for example, bus lanes, right turn on red) or to reduce vehicle use (ridesharing, high-occupancy-vehicle lanes) to reduce vehicular emissions of air pollutants.

**Vehicle Miles Traveled (VMT).** A measure of both the volume and the extent of motor vehicle operation; the total number of vehicle miles traveled within a specified geographical area (whether the entire country or a smaller area) over a given period of time.

**VOCs.** A group of chemicals that react in the atmosphere in the presence of heat and sunlight to form ozone. These do not include methane and other compounds determined by EPA to have negligible photochemical reactivity. Examples of VOCs include gasoline fumes (or vapors) and oil-based paints.

**Volatility.** The tendency or ability of a liquid (such as gasoline) to vaporize.



## Appendix C

### Overview of Titles I Through VII of the Clean Air Act Amendments of 1990

#### Title I—Provisions for Attainment and Maintenance of National Ambient Air Quality Standards (NAAQS)

The Environmental Protection Agency (EPA) monitors six indicator pollutants: ozone, carbon monoxide (CO), particulate matter (PM-10), sulfur oxides (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>), and lead (Pb). Exhibit C.1 shows the primary (based on protecting human health) and secondary (based on protecting the environment) standards that have been established for each pollutant. The Amendments treat nonattainment areas with minor violations quite differently than those with major compliance problems. They establish five classes of

ozone violations (marginal, moderate, serious, severe, and extreme) and two categories (moderate and serious) for CO and particulates. Each category has its own compliance deadline (shown in Exhibits 121.21a and 521.2) and control requirements. Areas with more severe pollution will be given more time to comply, but they must adopt more stringent controls.

#### Ozone

Ozone presents by far the biggest problem: more than 100 major areas do not comply with NAAQS because of excessive amounts of ozone (see Appendix D and the map in Exhibit 121.21b). Although many of these areas are only

Pollutant	Averaging Time	NAAQS <sup>a</sup> (ppm <sup>b</sup> )	
		Primary	Secondary
Carbon monoxide	8-hour	9.0	None
	1-hour	35.0	None
Lead	Calendar quarter	0.0001764	Same as primary
Nitrogen dioxide	Annual	0.053	Same as primary
Ozone <sup>c</sup>	1-hour	0.12	Same as primary
PM-10	Annual	50.0 (g/m <sup>3</sup> )	Same as primary
	24-hour	150.0 (g/m <sup>3</sup> )	
Sulfur dioxide	Annual	0.03	None
	24-hour	0.14	None
	3-hour	None	0.5

Source: Code of Federal Regulations. 40 CFR 50.4–50.12.

<sup>a</sup>National standards, other than those based on annual averages, are not to be exceeded more than once a year (except where noted).

<sup>b</sup>ppm stands for parts per million.

<sup>c</sup>The ozone standard is attained when the expected number of days per calendar year in which the maximum hourly average concentration is above the standard is equal to or less than one.

#### Exhibit C.1, Summary of the National Ambient Air Quality Standards (NAAQS)

slightly over the hourly limit of 0.12 parts per million (ppm), others far exceed it. Ozone is difficult to control because it has several sources. It forms in the atmosphere, primarily in the late morning and early afternoon, when NO<sub>x</sub> combines with any of several types of hydrocarbons. Because the complex chemical reactions that produce ozone are triggered in part by the sun's energy, the problem is worse in areas with large numbers of motor vehicles and hot, sunny climates and may vary seasonally. Exhibit C.2 list the requirements for ozone nonattainment areas.

### Other Indicator Pollutants

CO and PM-10 pose lesser problems, with 48 areas not in compliance with the CO limit (see Appendix E and the map in Exhibit 121.21c) and 77 areas not complying with the limit for particulates (see Appendix F and the map in Exhibit 121.21d). Exhibit C.3 lists the requirements for CO nonattainment areas. The maps in Exhibits C.4 and C.5 show the polluted areas for lead and SO<sub>2</sub>, respectively. (See the boxes on lead and SO<sub>2</sub>.) For the actual listings of the lead and SO<sub>2</sub> nonattainment areas, refer to the November 6, 1991, issue of the *Federal Register* (56 FR 56694).

### Nonattainment Areas

As previously stated, the most current listings (as of the date of publication) of the nonattainment areas for ozone, CO, and PM-10 are in Appendices D, E, and F, respectively. However, these listings are always being updated; in particular, EPA will be updating the ozone listing in the near future. Therefore, it is important for postal employees involved in clean air compliance issues to keep constant contact with the appropriate federal, state, and local contacts listed in Appendices I and J.

#### Lead in Gasoline

- As of January 1, 1996, lead is banned from use in motor vehicle fuel.
- EPA, in conjunction with the U.S. Department of Agriculture, is required to develop procedures for testing the effectiveness of lead substitute additives for use in gasoline.
- Beginning with model year 1993, it will be unlawful to manufacture or sell new motor vehicle engines and nonroad engines that require the use of leaded gasoline.

#### Sulfur Dioxide (SO<sub>2</sub>) Emissions Reductions

- Two-phase reduction program—10 million tons from 1980 levels:
  - 1995: Phase I reductions from large high-emitting utility plants.
  - 2000: Phase II reductions from smaller lower emitting utility plants.
- The SO<sub>2</sub> cap on utility emissions is set at approximately 8.9 million tons per year in the year 2000.

### Title II—Provisions Relating to Mobile Sources

Title II of the Amendments defines pollution reduction requirements for motor vehicles. The motor vehicle industry has made significant progress in controlling pollutants, with the average 1990 car emitting 90 percent less pollution than its 1970 counterpart. Nonetheless, cars, trucks, buses, and other motor vehicles continue to cause 33 percent of all emissions of hydrocarbons, an essential ingredient for ozone formation. Vehicles also tend to emit other pollutants, such as CO, NO<sub>x</sub> (another key ingredient for ozone formation), and PM-10. The principal reasons for this problem are the rapid growth in the number of vehicles on the roadways and the total miles driven. This growth has offset a large portion of the emission reductions gained from motor vehicle emissions controls.

Title II requires centrally fueled fleets to use only clean fuels in areas with CO levels of 16.5 ppm and above or in areas seriously, severely, or extremely above the limit for ozone (see section 233 in Chapter 2 of this handbook). The Amendments define clean fuels as any fuel such as methanol, ethanol, or other alcohols, including any mixture thereof, that combines 85 percent or more by volume of such alcohol with gasoline or other fuels (reformulated gasoline, natural gas, liquefied petroleum gas, and hydrogen) or power source (including electricity). Also, new federally mandated programs require cleaner, reformulated gasoline to be sold by 1995 in the nine worst ozone nonattainment areas (Los Angeles, Baltimore, Chicago, Houston, Milwaukee, New York City, Philadelphia, San Diego, and Hartford). Other cities can "opt in" to the reformulated gasoline program (see the box). Higher levels (2.7 percent) of alcohol-based oxygenated fuels will be produced and sold in 41 areas that exceed the federal standard for CO during the winter months (see the box). The standards will become stricter in 2001.



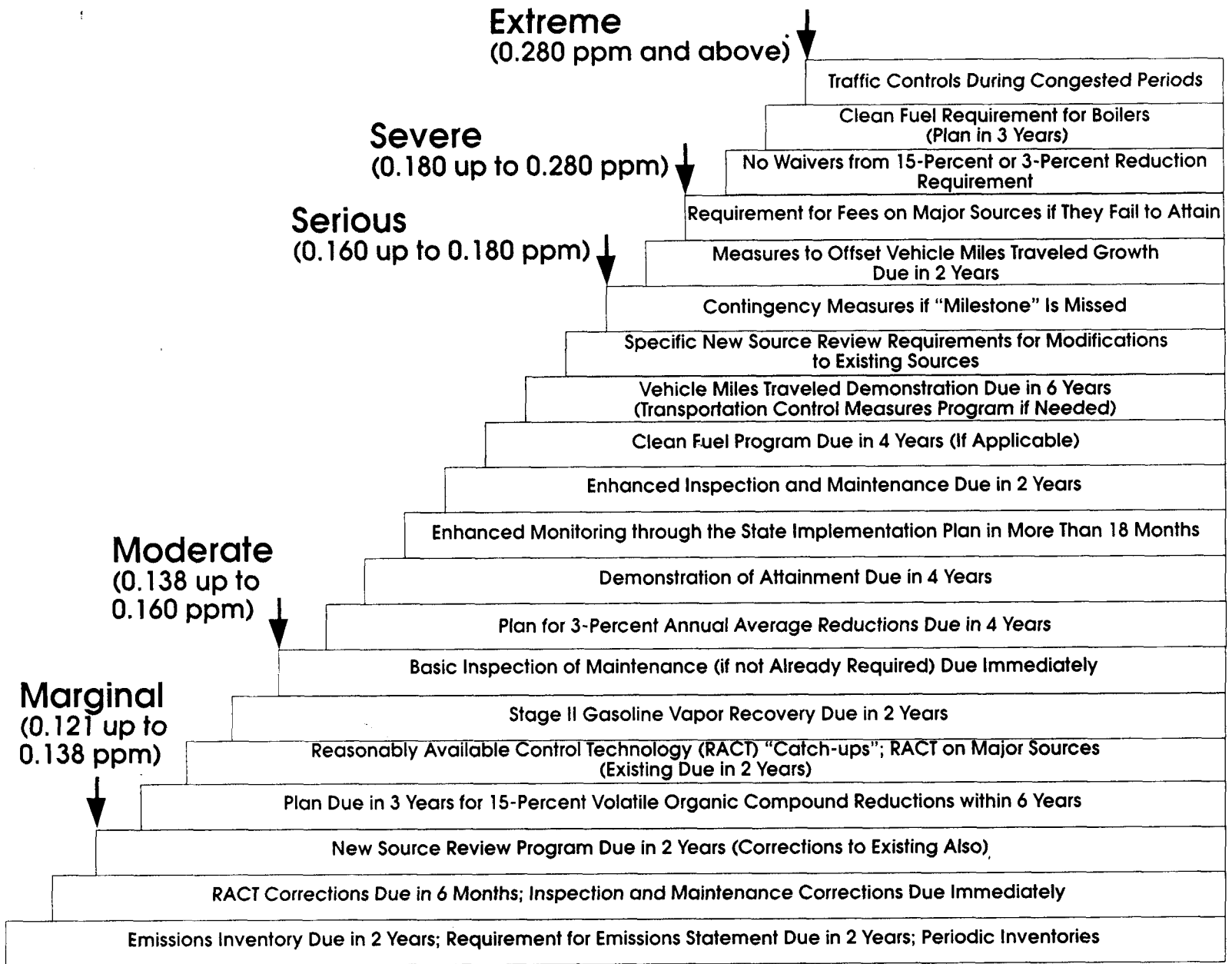


Exhibit C.2, Control Requirements for Ozone Nonattainment Areas

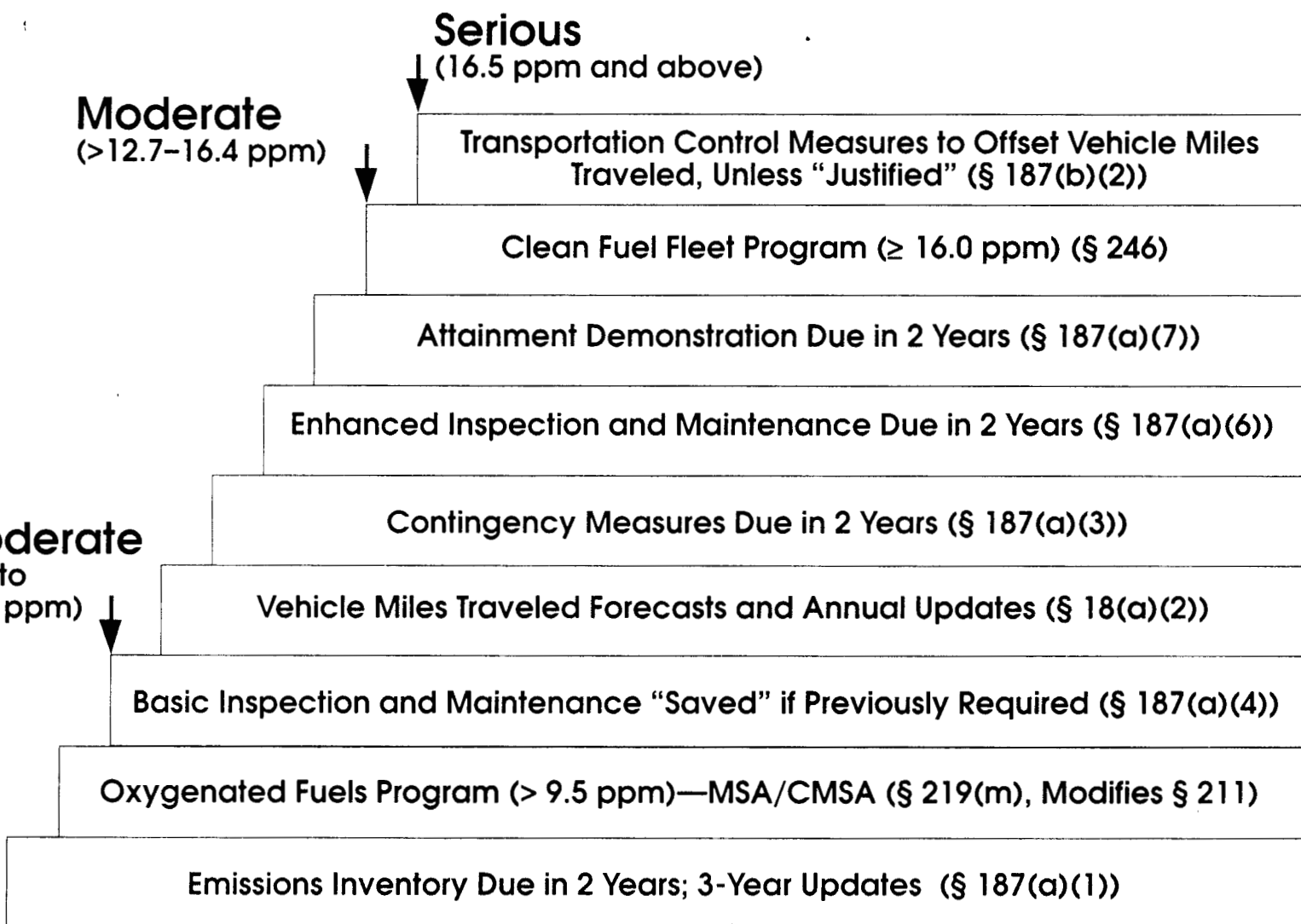


Exhibit C-3, Control Requirements for Carbon Monoxide Nonattainment Areas



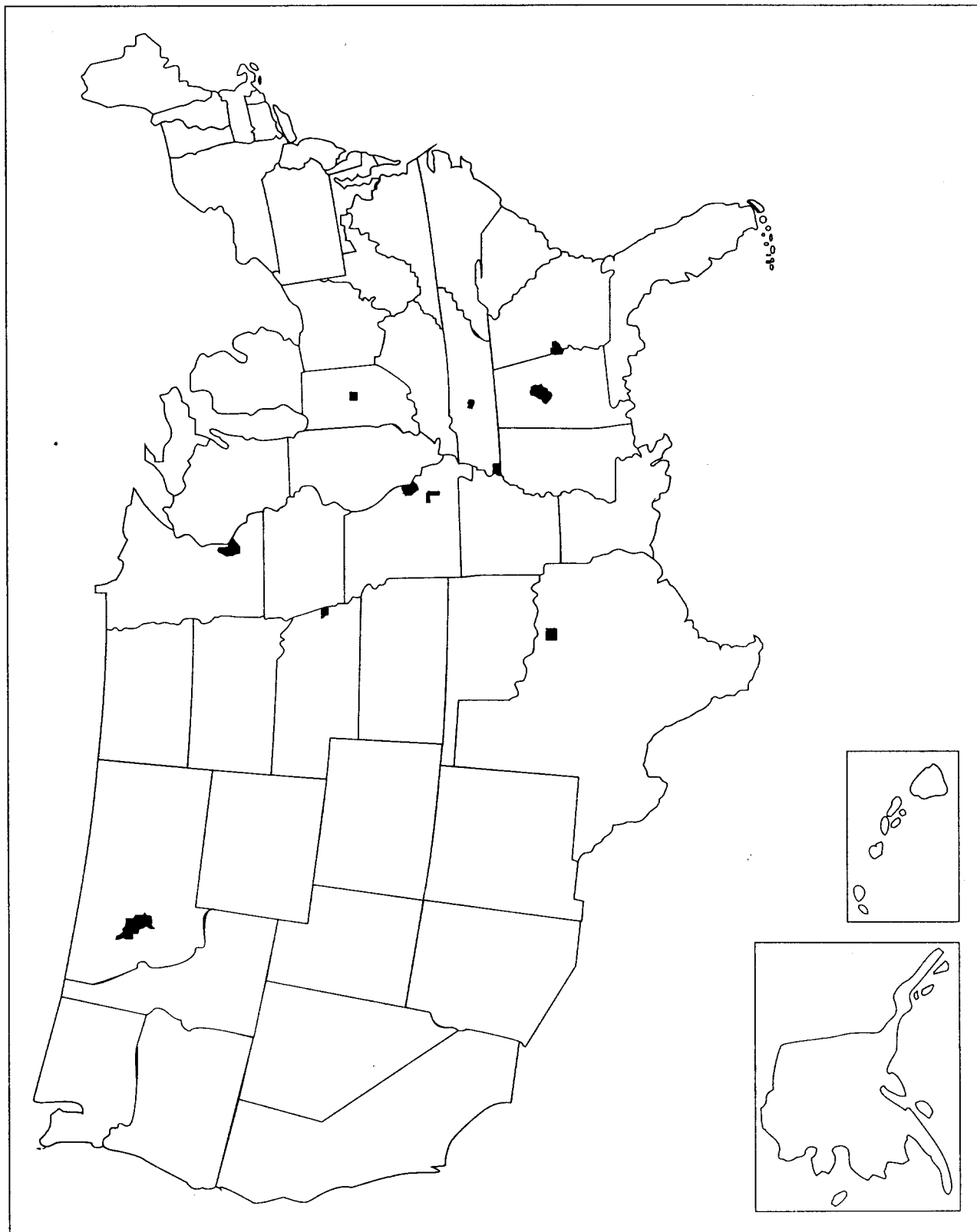


Exhibit C.4, Lead Nonattainment Areas in the United States

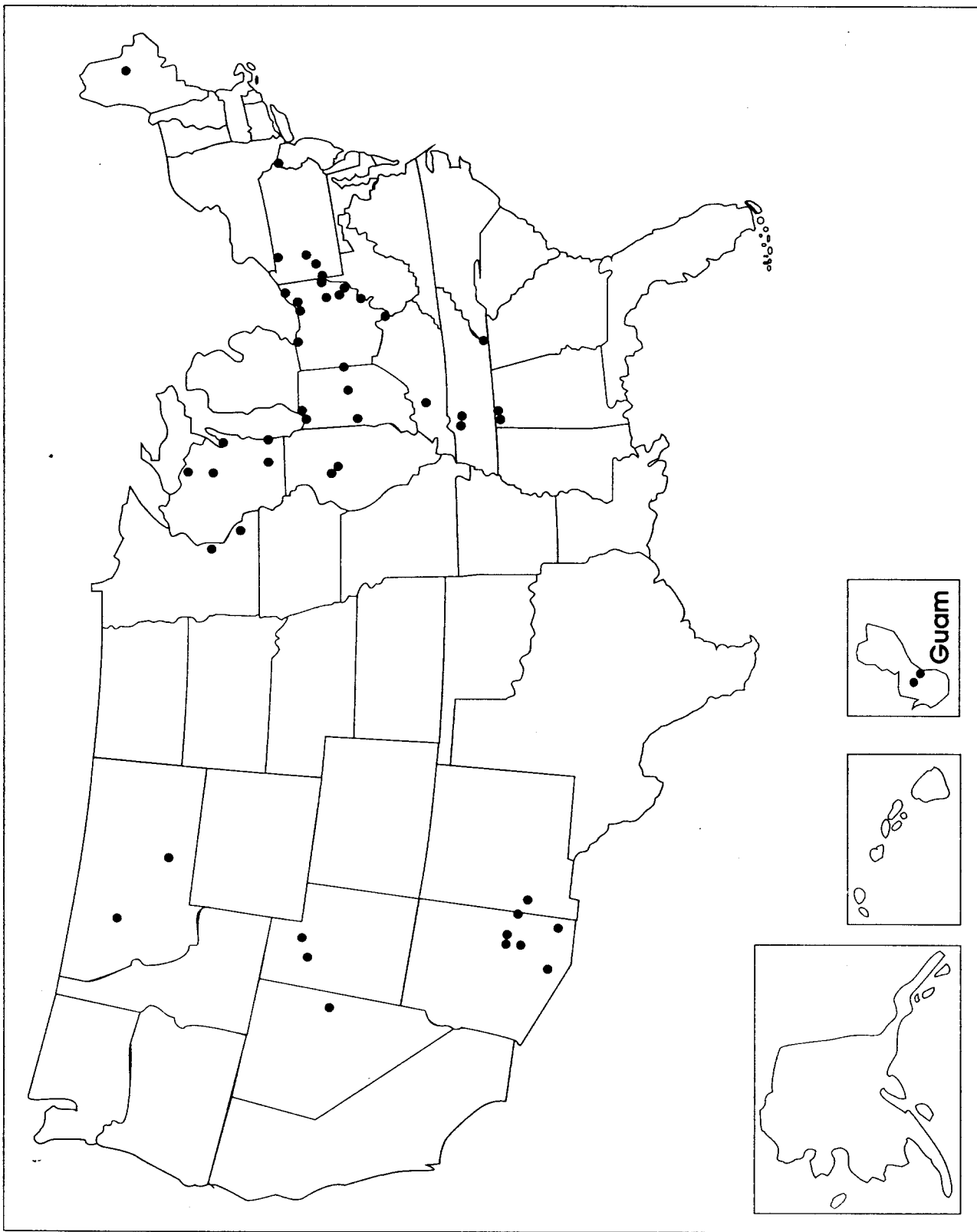


Exhibit C.5, Sulfur Dioxide Nonattainment Areas in the United States

Furthermore, the country's most polluted nonattainment areas for CO and serious, severe, or extreme nonattainment areas for ozone must adopt a program limiting emissions from centrally fueled fleets of 10 or more vehicles beginning as early as 1998.

### Title III—Hazardous Air Pollutants

Hazardous air pollutants are those that are hazardous to human health or the environment but are not specifically covered under other portions of the Clean Air Act. These pollutants include carcinogens, mutagens, and teratogens. The law includes a list of 189 toxic air pollutants for which emissions must be reduced (see Appendix G). By law, EPA must publish a list of source categories that emit certain levels of these pollutants. The list must include (1) major sources emitting 10 tons per year of any one of the pollutants or 25 tons per year of any combination of those pollutants and (2) area sources (smaller sources). The list will be forwarded to the Headquarters and regional environmental steering committees when it becomes available. Exhibit C.6 depicts the EPA review process and its role in publishing the list of source categories.

#### Reformulated Gasoline

- All gasoline sold in nine worst ozone cities beginning in 1995.
- Requirement of 2.0 percent minimum oxygen, averaging allowed.
- Requirement of 15-percent volatile organic compound and toxics reductions from 1990 baseline fuel.
- Requirement of 1.0 percent maximum benzene, averaging allowed.
- Reduction of aromatics as necessary to meet toxics standard.
- In the year 2000, volatile organic compound and toxics reductions must be 25 percent (if not feasible, EPA can set at 20 percent).
- No increase in nitrogen oxides.
- Antidumping provision.
- Any ozone area can "opt in."
- Antideposit detergents must be added to all gasoline nationwide.

#### Oxygenated Fuels Carbon Monoxide Program

- Beginning November 1, 1992, all gasoline in 41 nonattainment areas must be oxygenated during winter months.
- Requirement of 2.7 percent oxygen level.
- EPA can delay program start by up to two years for insufficient domestic supply and distribution capacity.

### Title IV—Acid Deposition Control

Acid deposition occurs when sulfur dioxide (SO<sub>2</sub>) and NO<sub>x</sub> emissions react with moisture in the atmosphere and return to the Earth as sulfuric and nitric acids in the form of acid rain, fog, or snow. Approximately 20 million tons of SO<sub>2</sub> are emitted annually in the United States, mostly from the burning of fossil fuels. Title IV regulates these sources and affects the Postal Service primarily because of its operation of facility boilers.

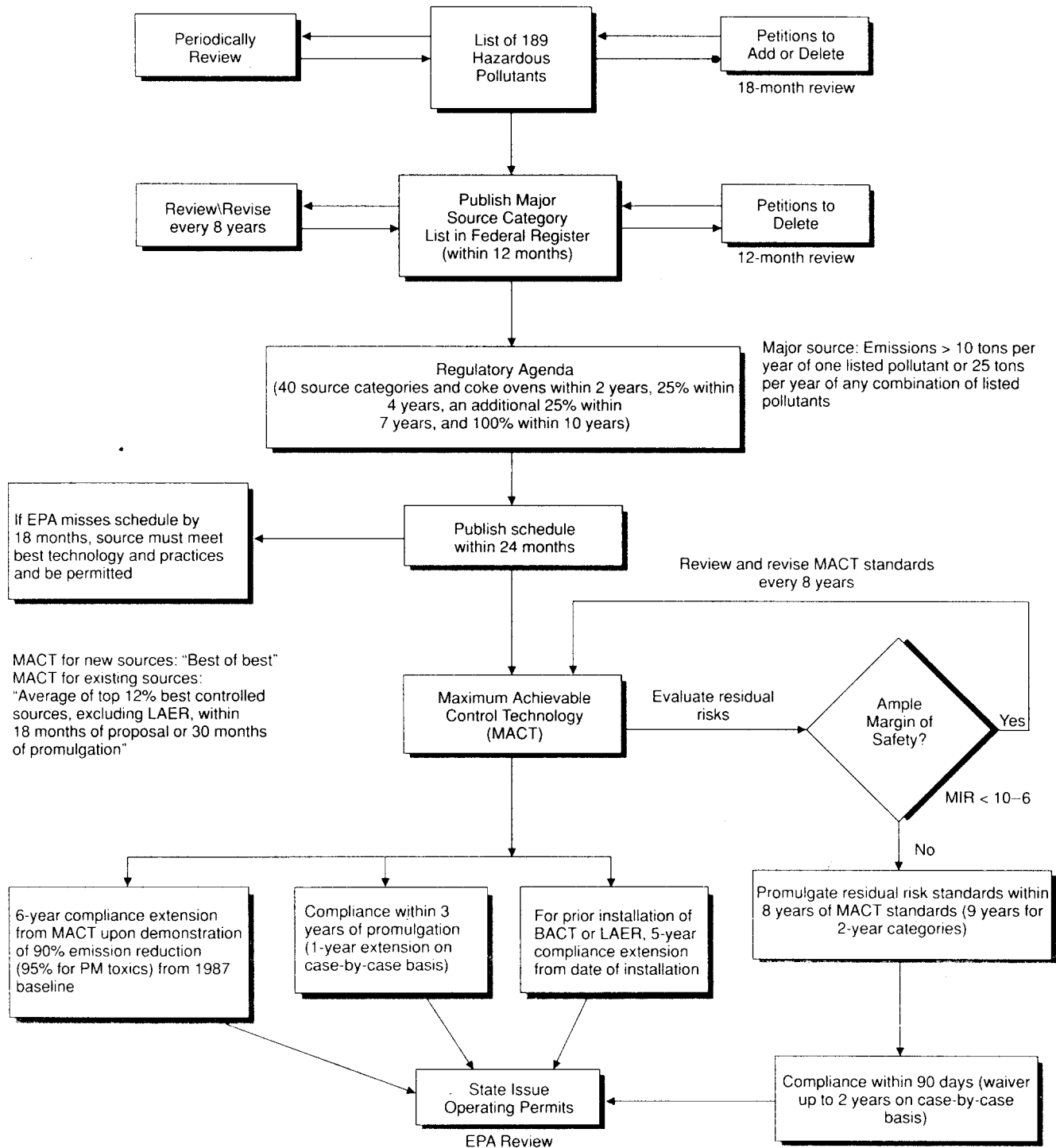
### Title V—Permits

By requiring all major sources of air pollution to obtain permits, Title V will extend emissions controls to thousands of sources in many areas that until now have remained unregulated. Major sources include any entity that emits more than 100 tons per year of any of the six indicator pollutants (CO, lead, NO<sub>x</sub>, ozone, particulates, and SO<sub>2</sub>) and any entity that annually emits more than 10 tons of one hazardous air pollutant or 25 tons per year of any combination of hazardous air pollutants. The Amendments direct states to set permit fees of at least \$25 for each ton of annual emissions, up to 4,000 tons, and empower states with permit programs approved by EPA to enforce the permits and fine violators up to \$10,000 per day. Exhibit C.7 shows Title V's relationship to other titles of the act and to state programs. (See Chapter 3 of this handbook.)

### Title VI—Stratospheric Ozone Protection

Title VI requires a complete production phaseout of ozone-depleting chemicals (CFCs and halons), along with interim reductions and some related changes to the existing Montreal Protocol, which was revised in June 1990. (The Montreal Protocol is an international agreement to control chemicals that deplete the ozone layer. The protocol calls for a production phaseout of CFCs, halons, and carbon tetrachloride by





Source: U.S. Environmental Protection Agency.

Exhibit C.6, EPA's Review Process Concerning Hazardous Air Pollutants



the year 2000 and a production phaseout of methyl chloroform by 2002. It also provides financial assistance to developing countries with respect to ozone-depleting substances.) Under these provisions, EPA must list all regulated substances, along with their ozone depletion potential, atmospheric lifetimes, and global warming potential; the first phase of this activity was promulgated on March 6, 1991, in the *Federal Register* (see 56 FR 9518). (See Appendix H.)

EPA must ensure that production of Class I chemicals is phased out on a schedule similar to that specified in the Montreal Protocol—CFCs, halons, and carbon tetrachloride by the year 2000 and methyl chloroform by 2002. Production of Class II chemicals (HCFCs) is to be phased out by 2030. (Appendix H lists both Class I and Class II substances.)

The Amendments require nonessential products releasing Class I chemicals to be banned within two years of enactment. In 1994, a ban will go into effect for aerosols and noninsulating foams using Class II chemicals, with exemptions for flammability and safety.

### Title VII—Provisions Relating to Enforcement

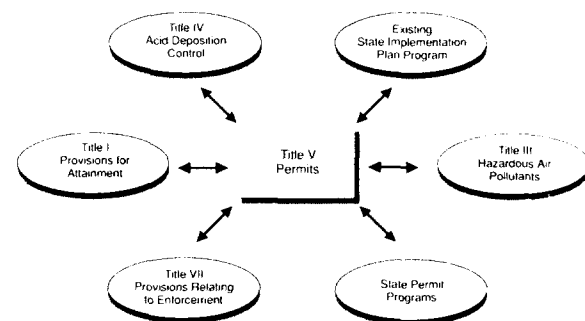
The Amendments contain a broad array of provisions to make the law more readily enforceable, thus bringing it up to date with the other major environmental statutes. An example is that the burden of proof is on the defendant for purposes of determining penalty liability once it has been shown that a violation has occurred.

EPA has new provisions to issue administrative penalty orders up to \$200,000 and field citations up to \$5,000 for lesser infractions. Civil judicial penalties have also been increased. Criminal penalties for violations have been upgraded from misdemeanors to felonies, and new criminal provisions for endangerment have been established (for example, releases of hazardous air pollutants, failure to pay fees, violation of a permit, release of pollutants above the limit, filing false statements, or failure to install required monitoring devices). It is important to note that provisions have been established to eliminate special treatment nor-

mally afforded nonmanagement employees in cases of “knowing” and “willful” violations. Knowing violations are those in which individuals or parties have knowledge of the law but willfully ignore it. A person who knows that he or she is being ordered to commit an act that violates the law cannot avoid criminal liability. The government needs only to prove that the defendant knew he or she was committing an unlawful act.

Sources must certify their compliance, and EPA has the authority to issue administrative subpoenas for compliance data. EPA will also be authorized to issue compliance orders with compliance schedules of up to one year. *Falsifying records can result in jail terms.*

Finally, the role of citizens in ensuring compliance with the Clean Air Act has been strengthened by the Amendments. Citizen suits can be brought to enforce the requirement to obtain a permit, the conditions of permits, and the requirements contained in state implementation plans. In addition, citizen suits can be brought with respect to past violations if there is evidence that any violation has been repeated. Because of these strengthened provisions, citizen suits should be taken seriously.



Source: U.S. Environmental Protection Agency

**Exhibit C.7, The Relationship of Title V (Permits) to Other Titles of the Clean Air Act and to State Programs**



## Appendix D

### Nonattainment Areas for Ozone Listed by State, County, and Municipality

#### Alabama

Birmingham (Marginal)  
 Jefferson County  
 Shelby County

#### Arizona

Phoenix (Moderate)  
 Maricopa County<sup>a</sup>  
 Maricopa Association of Governments  
 Urban Planning Area

#### California

Chico Area (Transitional<sup>d</sup>)  
 Butte County  
 Imperial County (Transitional<sup>d</sup>)  
 Los Angeles-South Coast Air Basin (Extreme)  
 Los Angeles County<sup>a, b</sup>  
 Orange County  
 Riverside County<sup>a, b</sup>  
 San Bernardino County<sup>a, b</sup>  
 Monterey Bay (Moderate)  
 Monterey County  
 San Benito County<sup>c</sup>

Santa Cruz County<sup>c</sup>  
 Sacramento Metro (Serious)  
 El Dorado County<sup>a</sup>  
 All of county up to Lake Tahoe<sup>b</sup>  
 Placer County<sup>a</sup>  
 All of county up to Lake Tahoe<sup>b</sup>  
 Sacramento County  
 Solano County<sup>a</sup>  
 Northeastern portion<sup>b</sup>  
 Sutter County<sup>a</sup>  
 Southern portion<sup>b</sup>  
 Yolo County  
 San Diego (Severe-15)  
 San Diego County  
 San Francisco-Bay Area (Moderate)  
 Alameda County  
 Contra Costa County  
 Marin County  
 Napa County  
 San Francisco County  
 San Mateo County  
 Santa Clara County  
 Solano County<sup>a</sup>  
 Southwestern portion<sup>b</sup>  
 Sonoma County<sup>a</sup>  
 Southeastern portion<sup>b</sup>

<sup>a</sup> A portion of the county is located within the area and is designated nonattainment.

<sup>b</sup> For a description of the geographic boundary, see the *Federal Register* (56 FR 56694, November 6, 1991).

<sup>c</sup> The counties (or cities or townships) are either (1) part of the previous planning area but not part of the Standard Metropolitan Statistical Area (SMSA) or Metropolitan Statistical Area (MSA) or (2) counties adjacent to the SMSA (or MSA) and measuring violations.

<sup>d</sup> Transitional areas are those determined to be nonattainment for ozone prior to the enactment of the Clean Air Act Amendments of 1990 (1987 to 1989); EPA is responsible for determining the status of these areas by June 30, 1992—that is, whether the area attained the NAAQS by December 31, 1991.

<sup>e</sup> “(New)” means that the entire area was designated unclassified/attainment on November 15, 1990 (that is, no part was attainment). The area has a designation date of January 6, 1992, indicated in the *Federal Register* (November 6, 1991).

<sup>f</sup> Incomplete data indicates certain ozone areas designated nonattainment prior to the enactment of the Amendments that do not have sufficient air quality monitoring data to determine whether they are or are not violating the NAAQS. Under these circumstances, EPA does not believe sufficient data (75 percent completeness for each year) exist to warrant a classification for the area.

## San Joaquin Valley (Serious)

Fresno County

Kern County

Kings County

Madera County

Merced County

San Joaquin County

Stanislaus County

Tulare County

## Santa Barbara-Santa Maria-Lompoc (Moderate)

Santa Barbara County

## Southeast Desert Modified Air Quality Maintenance Area (AQMA) (Severe-17)

Modified AQMA<sup>a</sup>

Los Angeles County

Northeastern portion<sup>b</sup>

Riverside County

Eastern portion<sup>b</sup>

San Bernardino County

Northeastern portion<sup>b</sup>

## Ventura County (Severe-15)

Yuba City (Transitional<sup>d</sup>)Sutter County<sup>c</sup>Northern portion<sup>b</sup>

Yuba County

*Colorado*Denver-Boulder (Transitional<sup>d</sup>)Adams County<sup>c</sup>Arapahoe County<sup>c</sup>Boulder County<sup>c</sup>

Denver County

Douglas County

Jefferson County

*Connecticut*

## Greater Connecticut (Serious)

Fairfield County<sup>c</sup>

City of Shelton

Hartford County

Litchfield County<sup>c</sup>

All cities and townships except Bridgewater and

New Milford

Middlesex County

New Haven County

New London County

Tolland County

Windham County

## New York-Northern New Jersey-Long Island (Severe-17)

Fairfield County<sup>c</sup>

All cities and townships except Shelton

Litchfield County<sup>c</sup>

Bridgewater and New Milford

*Delaware*

## Philadelphia-Wilmington-Trenton (Severe-15)

Kent County<sup>c</sup>

New Castle County

Sussex County (Marginal) (New<sup>c</sup>)*District of Columbia*

## Washington (Serious)

Entire area

*Florida*Jacksonville (Transitional<sup>d</sup>)

Duval County

## Miami-Fort Lauderdale-W. Palm Beach (Moderate)

Broward County

Dade County

Palm Beach County<sup>c</sup>

## Tampa-St. Petersburg-Clearwater (Marginal)

Hillsborough County

Pinellas County

*Georgia*

## Atlanta (Serious)

Cherokee County

Clayton County

Cobb County

Coweta County

De Kalb County

Douglas County

Fayette County

Forsyth County

Fulton County

Gwinnett County

Henry County

Paulding County

Rockdale County

*Illinois*

## Chicago-Gary-Lake County (Severe-17)

Cook County

Du Page County

Grundy County<sup>c</sup>

Aux Sable

Goose Lake

Kane County



Kendall County<sup>a</sup>  
 Oswego  
 Lake County  
 McHenry County  
 Will County  
 Jersey County (Marginal) (New<sup>a</sup>)  
 St. Louis (Moderate)  
 Madison County  
 Monroe County  
 St. Clair County

#### *Indiana*

Chicago-Gary-Lake County (Severe-17)  
 Lake County  
 Porter County  
 Evansville (Marginal) (New<sup>a</sup>)  
 Vanderburgh County  
 Indianapolis (Marginal)  
 Marion County  
 Louisville (Moderate)  
 Clark County  
 Floyd County  
 South Bend-Elkhart (Marginal)  
 Elkhart County<sup>a</sup>  
 St. Joseph County

#### *Kansas*

Kansas City (Submarginal)  
 Johnson County  
 Wyandotte County

#### *Kentucky*

Cincinnati-Hamilton (Moderate)  
 Boone County  
 Campbell County  
 Kenton County  
 Edmonson County (Rural Transport-Marginal) (New<sup>a</sup>)  
 Huntington-Ashland (Moderate)  
 Boyd County  
 Greenup County<sup>a, b</sup>  
 Lexington-Fayette (Marginal) (New<sup>a</sup>)  
 Fayette County  
 Scott County  
 Louisville (Moderate)  
 Bullitt County<sup>a, b</sup>  
 Jefferson County  
 Oldham County<sup>a, b</sup>  
 Owensboro (Marginal) (New<sup>a</sup>)  
 Daviess County  
 Hancock County<sup>a, b</sup>

Paducah (Marginal) (New<sup>a</sup>)  
 Livingston County<sup>a, b</sup>  
 Marshall County

#### *Louisiana*

Baton Rouge (Serious)  
 Ascension Parish  
 East Baton Rouge Parish  
 Iberville Parish<sup>a</sup>  
 Pointe Coupee Parish<sup>a</sup>  
 Livingston Parish  
 West Baton Rouge Parish  
 Beauregard Parish (Incomplete data<sup>a</sup>)  
 Grant Parish (Incomplete data<sup>a</sup>)  
 Lafayette Parish (Incomplete data<sup>a</sup>)  
 Lafourche Parish (Incomplete data<sup>a</sup>)  
 Lake Charles (Marginal)  
 Calcasieu Parish  
 New Orleans (Transitional<sup>a</sup>)  
 Jefferson Parish  
 Orleans Parish  
 St. Bernard Parish  
 St. Charles Parish  
 St. James Parish (Incomplete data<sup>a</sup>)  
 St. Mary Parish (Incomplete data<sup>a</sup>)

#### *Maine*

Franklin County<sup>a, b</sup> (Incomplete data<sup>a</sup>)  
 Hancock and Waldo Counties (Marginal)  
 Knox and Lincoln Counties (Moderate)  
 Lewiston-Auburn (Moderate)  
 Androscoggin County  
 Kennebec County<sup>a</sup>  
 Oxford County<sup>a, b</sup> (Incomplete data<sup>a</sup>)  
 Portland (Moderate)  
 Cumberland County  
 Sagadahoc County  
 York County  
 Somerset County<sup>a, b</sup> (Incomplete data<sup>a</sup>)

#### *Maryland*

Baltimore (Severe-15)  
 Anne Arundel County  
 Baltimore County  
 Carroll County  
 City of Baltimore  
 Harford County  
 Howard County

Kent and Queen Anne's Counties (Marginal) (New<sup>c</sup>)  
 Philadelphia-Wilmington-Trenton (Severe-15)

Cecil County  
 Washington (Serious)  
 Calvert County  
 Charles County  
 Frederick County  
 Montgomery County  
 Prince George's County

#### *Massachusetts*

Boston-Lawrence-Worcester (eastern Massachusetts) (Serious)

Barnstable County  
 Bristol County  
 Dukes County  
 Essex County  
 Middlesex County  
 Nantucket County  
 Norfolk County  
 Plymouth County  
 Suffolk County  
 Worcester County  
 Springfield (western Massachusetts) (Serious)  
 Berkshire County  
 Franklin County  
 Hampden County  
 Hampshire County

#### *Michigan*

Allegan County (Incomplete data<sup>f</sup>)  
 Barry County (Incomplete data<sup>f</sup>)  
 Battle Creek (Incomplete data<sup>f</sup>)  
 Calhoun County  
 Benton Harbor (Incomplete data<sup>f</sup>)  
 Berrien County  
 Branch County (Incomplete data<sup>f</sup>)  
 Cass County (Incomplete data<sup>f</sup>)  
 Detroit-Ann Arbor (Moderate)  
 Livingston County  
 Macomb County  
 Monroe County  
 Oakland County  
 St. Clair County  
 Washtenaw County  
 Wayne County  
 Flint (Transitional<sup>f</sup>)  
 Genesee County  
 Grand Rapids (Moderate)  
 Kent County  
 Ottawa County  
 Gratiot County (Incomplete data<sup>f</sup>)

Hillside County (Incomplete data<sup>f</sup>)  
 Huron County (Incomplete data<sup>f</sup>)  
 Ionia County (Incomplete data<sup>f</sup>)  
 Jackson County (Incomplete data<sup>f</sup>)  
 Kalamazoo County (Incomplete data<sup>f</sup>)  
 Lansing-E. Lansing (Transitional<sup>f</sup>)  
 Clinton County  
 Eaton County  
 Ingham County

Lapeer County (Incomplete data<sup>f</sup>)  
 Lenawee County (Incomplete data<sup>f</sup>)  
 Montcalm County (Incomplete data<sup>f</sup>)  
 Muskegon (Serious)

#### *Muskegon County*

The State requested time to study the boundaries under section 107(d)(4)(A)(iv). The boundaries of the Muskegon area will be determined based on an evaluation of that study by EPA. Any changes in the boundary may result in a change in the classification for part of the county.

Saginaw-Bay City-Midland (Incomplete data<sup>f</sup>)

Bay County  
 Midland County  
 Saginaw County  
 Sanilac County (Incomplete data<sup>f</sup>)  
 Shiawassee County (Incomplete data<sup>f</sup>)  
 St. Joseph County (Incomplete data<sup>f</sup>)  
 Tuscola County (Incomplete data<sup>f</sup>)  
 Van Buren County (Incomplete data<sup>f</sup>)

#### *Missouri*

Kansas City (Submarginal)

Clay County  
 Jackson County  
 Platte County  
 St. Louis (Moderate)  
 Franklin County  
 Jefferson County  
 St. Charles County  
 St. Louis (City)  
 St. Louis County

#### *Nevada*

Reno (Marginal) (New<sup>c</sup>)  
 Washoe County

#### *New Hampshire*

Belknap County (Incomplete data<sup>f</sup>)  
 Boston-Lawrence-Worcester (Serious)



Hillsborough County<sup>a</sup>

Amherst, Brookline, Hollis, Hudson, Litchfield,  
Merrimack, Milford, Mount Vernon, Nashua, Pelham,  
and Wilton

Rockingham County<sup>a</sup>

Atkinson, Brentwood, Danville, Derry, E. Kingston,  
Hampstead, Hampton Falls, Kensington, Kingston,  
Londonderry, Newton, Plaistow, Salem, Sandown,  
Seabrook, South Hampton, and Windham

Cheshire County (Incomplete data<sup>f</sup>)

## Manchester (Marginal)

Hillsborough County<sup>a</sup>

Antrim, Bedford, Bennington, Deering, Francestown,  
Goffstown, Greenfield, Greenville, Hancock,  
Hillsborough, Lyndeborough, Manchester, Mason, New  
Boston, New Ipswich, Peterborough, Sharon, Temple,  
Weare, and Windsor

## Merrimack County

Rockingham County<sup>a</sup>

Auburn, Candia, Chester, Deerfield, Epping, Fremont,  
Northwood, Nottingham, and Raymond

## Portsmouth-Dover-Rochester (Serious)

Rockingham County<sup>a</sup>

Exeter, Greenland, Hampton, New Castle, Newfields,  
Newington, Newmarket, North Hampton, Portsmouth,  
Rye, and Stratham

## Strafford County

Sullivan County (Incomplete data<sup>f</sup>)*New Jersey*

## Allentown-Bethlehem-Easton (Marginal)

## Warren County

## Atlantic City (Moderate)

## Atlantic County

## Cape May County

## New York-Northern New Jersey-Long Island (Severe-17)

## Bergen County

## Essex County

## Hudson County

## Hunterdon County

## Middlesex County

## Monmouth County

## Morris County

## Ocean County

## Passaic County

## Somerset County

## Sussex County

## Union County

## Philadelphia-Wilmington-Trenton (Severe-15)

## Burlington County

## Camden County

## Cumberland County

## Gloucester County

## Mercer County

## Salem County

*New York*Albany-Schenectady-Troy (Marginal) (New<sup>c</sup>)

## Albany County

## Greene County

## Montgomery County

## Rensselaer County

## Saratoga County

## Schenectady County

Buffalo-Niagara Falls (Marginal) (New<sup>c</sup>)

## Erie County

## Niagara County

Essex County<sup>a</sup> (Rural Transport-Marginal) (New<sup>c</sup>)

The portion of Whiteface Mountain above 4,500 feet in  
elevation in Essex County

Jefferson County (Marginal) (New<sup>c</sup>)

## New York-Northern New Jersey-Long Island (Severe-17)

## Bronx County

## Kings County

## Nassau County

## New York County (Manhattan)

## Orange County

## Putnam County

The State requested time to study the boundaries and  
classification under section 107(d)(4)(A)(iv). The  
boundaries and classification of Orange and Putnam  
Counties will be determined based on an evaluation of  
that study by EPA.

## Queens County

## Richmond County

## Rockland County

## Suffolk County

## Westchester County

Poughkeepsie (Marginal) (New<sup>c</sup>)

## Dutchess County

*North Carolina*

## Charlotte-Gastonia (Moderate)

## Gaston County

## Mecklenburg County

Greensboro-Winston-Salem-High Point (Moderate) (New<sup>c</sup>)

## Davidson County

Davie County<sup>a</sup>

The area bounded by the Yadkin River, Dutchmans  
Creek, North Carolina Highway 801, Fulton Creek, and  
back to the Yadkin River

## Forsyth County

## Guilford County

Raleigh-Durham (Moderate) (New<sup>c</sup>)

Durham County  
 Granville County<sup>a</sup>  
 Dutchville  
 Wake County

*Ohio*

## Canton (Marginal)

Stark County

## Cincinnati-Hamilton (Moderate)

Butler County  
 Clermont County  
 Hamilton County  
 Warren County

## Cleveland-Akron-Lorain (Moderate)

Ashtabula County<sup>a</sup>  
 Cuyahoga County  
 Geauga County  
 Lake County  
 Lorain County  
 Medina County  
 Portage County  
 Summit County

Clinton County (Transitional<sup>d</sup>)Columbiana County (Incomplete data<sup>f</sup>)Columbus (Marginal) (New<sup>c</sup>)

Delaware County  
 Franklin County  
 Licking County

## Dayton-Springfield (Moderate)

Clark County  
 Greene County  
 Miami County  
 Montgomery County

## Toledo (Moderate)

Lucas County  
 Wood County

## Youngstown-Warren-Sharon (Marginal)

Mahoning County  
 Trumbull County

*Oregon*

## Portland-Vancouver AQMA (Marginal)

Clackamas County<sup>a</sup>  
 Multnomah County<sup>a</sup>  
 Washington County<sup>a</sup>

Salem (Incomplete data<sup>f</sup>)

Marion County<sup>a</sup>  
 Polk County<sup>a</sup>

*Pennsylvania*

## Allentown-Bethlehem-Easton (Marginal)

Carbon County  
 Lehigh County  
 Northampton County

Altoona (Marginal) (New<sup>c</sup>)

Blair County

Crawford County (Incomplete data<sup>f</sup>)

## Erie (Marginal)

Erie County

Franklin County (Incomplete data<sup>f</sup>)Greene County (Incomplete data<sup>f</sup>)

## Harrisburg-Lebanon-Carlisle (Marginal)

Cumberland County

Dauphin County

Lebanon County

Perry County

Johnstown (Marginal) (New<sup>c</sup>)

Cambria County

Somerset County

Juniata County (Incomplete data<sup>f</sup>)

## Lancaster (Marginal)

Lancaster County

Lawrence County (Incomplete data<sup>f</sup>)Northumberland County (Incomplete data<sup>f</sup>)

## Philadelphia-Wilmington-Trenton (Severe-15)

Bucks County

Chester County

Delaware County

Montgomery County

Philadelphia County

Pike County (Incomplete data<sup>f</sup>)

## Pittsburgh-Beaver Valley (Moderate)

Allegheny County

Armstrong County<sup>a</sup>

Beaver County

Butler County<sup>a</sup>

Fayette County

Washington County

Westmoreland County

## Reading (Moderate)

Berks County

Schuylkill County (Incomplete data<sup>f</sup>)

## Scranton-Wilkes-Barre (Marginal)

Columbia County

Lackawanna County

Luzerne County

Monroe County

Wyoming County

Snyder County (Incomplete data<sup>f</sup>)

Susquehanna County (Incomplete data')  
Warren County (Incomplete data')  
Wayne County (Incomplete data')  
York (Marginal)  
    Adams County  
    York County  
Youngstown-Warren-Sharon (Marginal)  
    Mercer County

*Rhode Island*

Providence (all of Rhode Island) (Serious)  
    Bristol County  
    Kent County  
    Newport County  
    Providence County  
    Washington County

*South Carolina*

Cherokee County (Marginal) (New')

*Tennessee*

Knoxville (Marginal) (New')  
    Knox County  
Memphis (Marginal)  
    Shelby County  
Nashville (Moderate)  
    Davidson County  
    Rutherford County  
    Sumner County  
    Williamson County  
    Wilson County

*Texas*

Beaumont-Port Arthur (Serious)  
    Hardin County  
    Jefferson County  
    Orange County  
Dallas-Ft. Worth (Moderate)  
    Collin County  
    Dallas County  
    Denton County  
    Tarrant County  
El Paso (Serious)  
    El Paso County  
Houston-Galveston-Brazoria (Severe-17)  
    Brazoria County  
    Chambers County  
    Fort Bend County

Galveston County  
Harris County  
Liberty County  
Montgomery County  
Waller County  
Victoria (Incomplete data')  
    Victoria County

*Utah*

Salt Lake City (Moderate)  
    Davis County  
    Salt Lake County

*Virginia*

Norfolk-Virginia Beach-Newport News (Marginal) (New')  
    James City County  
    Chesapeake  
    Hampton  
    Newport News  
    Norfolk  
    Poquoson  
    Portsmouth  
    Suffolk  
    Virginia Beach  
    Williamsburg  
    York County  
Richmond-Petersburg (Moderate)  
    Charles City County  
    Chesterfield County  
    Colonial Heights  
    Hanover County  
    Henrico County  
    Hopewell  
    Richmond  
Smyth County' (Rural Transport-Marginal) (New')  
    The portion of White Top Mountain above 4,500-foot  
    elevation in Smyth County  
Washington (Serious)  
    Alexandria  
    Arlington County  
    Fairfax (City)  
    Fairfax County  
    Falls Church  
    Loudoun County  
    Manassas  
    Manassas Park  
    Prince William County  
    Stafford County



*Washington*

Portland-Vancouver AQMA (Marginal)

Clark County<sup>a</sup>Seattle-Tacoma (Marginal) (New<sup>a</sup>)

King County

Pierce County

Snohomish County

*West Virginia*Charleston (Moderate) (New<sup>a</sup>)

Kanawha County

Putnam County

Greenbrier County (Marginal) (New<sup>a</sup>)

Huntington-Ashland (Moderate)

Cabell County

Wayne County

Parkersburg-Marietta (Moderate) (New<sup>a</sup>)

Wood County

*Wisconsin*Door County (Rural Transport-Marginal) (New<sup>a</sup>)Kewaunee County (Moderate) (New<sup>a</sup>)Manitowoc County (Moderate) (New<sup>a</sup>)

Milwaukee-Racine (Severe-17)

Kenosha County

Milwaukee County

Ozaukee County

Racine County

Washington County

Waukesha County

Sheboygan (Serious)

Sheboygan County

Walworth County (Marginal) (New<sup>a</sup>)

## Appendix E

### Nonattainment Areas for Carbon Monoxide Listed by State, County, and Municipality

#### Alaska

Anchorage (Moderate, >12.7 ppm)  
 Anchorage Borough<sup>a</sup>  
 Portion of Anchorage urban area<sup>b</sup>  
 Fairbanks (Moderate, 12.7 ppm)  
 Fairbanks North Star Borough<sup>a</sup>  
 Portion of Fairbanks urban area<sup>b</sup>

#### Arizona

Phoenix (Moderate, 12.7 ppm)  
 Maricopa County<sup>a</sup>  
 Maricopa Association of Governments Urban  
 Planning Area<sup>b</sup>

#### California

Chico (Moderate, 12.7 ppm)  
 Butte County<sup>a</sup>  
 Chico urbanized area (Census Bureau urbanized  
 part—5/16/84, 49 FR 20651)  
 Fresno (Moderate, >12.7 ppm)  
 Fresno County<sup>a</sup>  
 Fresno urbanized area (see 11/20/85, 50 FR 47735)  
 Lake Tahoe South Shore (Moderate, 12.7 ppm)  
 El Dorado County<sup>a</sup>  
 Lake Tahoe area<sup>b</sup>  
 Los Angeles South Coast Air Basin (Serious)  
 Los Angeles County<sup>a, b</sup>  
 Orange County<sup>a</sup>  
 Riverside County<sup>a, b</sup>  
 San Bernardino County<sup>a, b</sup>  
 Modesto (Moderate, 12.7 ppm)  
 Stanislaus County<sup>a</sup>  
 Modesto urbanized area (Census Bureau  
 urbanized area—3/29/85, 50 FR 12540)  
 Sacramento (Moderate, 12.7 ppm)  
 Census Bureau urbanized areas

Placer County<sup>a</sup>  
 Sacramento County<sup>a</sup>  
 Yolo County<sup>a</sup>  
 San Diego (Moderate, 12.7 ppm)  
 San Diego County<sup>a</sup>  
 Western part of county<sup>b</sup>  
 San Francisco-Oakland-San Jose  
 (Moderate, 12.7 ppm)  
 Urbanized areas (described in the Technical  
 Support Document from 3/29/85, 50 FR 12540)  
 Alameda County<sup>a</sup>  
 Contra Costa County<sup>a</sup>  
 Marin County<sup>a</sup>  
 Napa County<sup>a</sup>  
 San Francisco County<sup>a</sup>  
 San Mateo County<sup>a</sup>  
 Santa Clara County<sup>a</sup>  
 Solano County<sup>a</sup>  
 Sonoma County<sup>a</sup>  
 Stockton (Moderate, 12.7 ppm)  
 San Joaquin County<sup>a</sup>  
 Stockton urbanized area (see 5/16/84, 49 FR 20651)

#### Colorado

Colorado Springs (Moderate, 12.7 ppm)  
 Urban Transportation Planning Study Area as  
 defined in 1989<sup>b</sup>  
 El Paso County<sup>a</sup>  
 Teller County<sup>a</sup>  
 Denver-Boulder (Moderate, >12.7 ppm)  
 Denver Metro Area<sup>b</sup>  
 Adams County<sup>a</sup>  
 Arapahoe County<sup>a</sup>  
 Boulder County<sup>a</sup>  
 Denver County<sup>a</sup>  
 Douglas County<sup>a</sup>  
 Jefferson County<sup>a</sup>  
 Fort Collins (Moderate, 12.7 ppm)  
 Larimer County<sup>a</sup>

<sup>a</sup> A portion of the county is located within the area and is designated nonattainment.

<sup>b</sup> For a description of the geographic boundary, see the *Federal Register* (56 FR 56694, November 6, 1991).

“(New)” means that the entire area was designated “unclassified/attainment” on November 15, 1990 (that is, no part was attainment). The area has a designation date of January 6, 1992, indicated in the *Federal Register* (November 6, 1992).



Fort Collins Urban Growth Area boundary as adopted by the City of Fort Collins and the Larimer County Commissioners and in effect as of July 30, 1991

Longmont (Moderate, 12.7 ppm) (New<sup>a</sup>)

Portion of Longmont<sup>b</sup>

Boulder County<sup>a</sup>

Weld County<sup>a</sup>

#### *Connecticut*

Hartford-New Britain-Middletown

(Moderate, 12.7 ppm)

Hartford County<sup>a</sup>

Avon, Berlin, Bloomfield, Bristol, Burlington, Canton, E. Granby, E. Hartford, E. Windsor, Enfield, Farmington, Glastonbury, Granby, Hartford, Manchester, Marlborough, New Britain, Newington, Plainville, Rocky Hill, Simsbury, Southington, S. Windsor, Suffield, W. Hartford, Wethersfield, Windsor, and Windsor Locks

Litchfield County<sup>a</sup>

Plymouth

Middlesex County<sup>a</sup>

Cromwell, Durham, E. Haddam, E. Hampton, Haddam, Middlefield, Middleton, and Portland

Tolland County<sup>a</sup>

Andover, Bolton, Ellington, Hebron, Somers, Tolland, and Vernon

New York-Northern New Jersey-Long Island

(Moderate, >12.7 ppm)

Fairfield County<sup>a</sup>

All cities and townships except Shelton

Litchfield County<sup>a</sup>

Bridgewater and New Milford

#### *District of Columbia*

Washington (Moderate, 12.7 ppm)

Entire Area

#### *Maryland*

Baltimore (Moderate, 12.7 ppm)

Baltimore City<sup>a</sup>

Regional Planning District No. 118 (generally corresponding to the Central Business District)

Washington (Moderate, 12.7 ppm)

Montgomery County<sup>a</sup>

Election districts 4, 7, and 13

Prince George's County<sup>a</sup>

Election districts 2, 6, 12, 16, 17, and 18

#### *Massachusetts*

Boston (Moderate, 12.7 ppm)

Middlesex County<sup>a</sup>

Cambridge, Everett, Malden, Medford, and Somerville

Norfolk County<sup>a</sup>

Quincy

Suffolk County<sup>a</sup>

Boston, Chelsea, and Revere

#### *Minnesota*

Duluth (Moderate, 12.7 ppm) (New<sup>a</sup>)

St. Louis County<sup>a</sup>

Duluth City

Minneapolis-St. Paul (Moderate, 12.7 ppm)

Anoka County

Carver County<sup>a</sup>

Carver, Chanhassen, Chaska, Hamburg, Norwood, Victoria, Waconia, Watertown, Young America, Chaska township, Laketown township, Waconia township, Watertown township, and Young America township

Dakota County<sup>a</sup>

Apple Valley, Burnsville, Eagan, Farmington, Hastings, Inver Grove Heights, Lakeville, Lilydale, Mendota, Mendota Heights, Rosemount, South St. Paul, Sunfish Lake, and West St. Paul

Hennepin County

Ramsey County

Scott County<sup>a</sup>

Belle Plaine, Elko, New Market, New Prague, Prior Lake, Savage, Shakopee, Credit River township, Jackson township, Louisville township, New Market township, and Spring Lake township

Washington County<sup>a</sup>

All cities and townships except Denmark township

Wright County<sup>a</sup>

Albertville, Annandale, Buffalo, Clearwater, Cokato, Delano, Hanover, Monticello, Montrose, Rockford, St. Michael, South Haven, Waverly, Dayton (Wright County part), Buffalo township, Chatham township, Clearwater township, Cokato township, Corinna township, Frankfort township, Franklin township, Maple Lake township, Marysville township, Monticello township, Ostego township, Rockford township, Silver Creek township, and Southside township





*Montana*

Missoula (Moderate, 12.7 ppm)

Missoula County"

Missoula and vicinity"

*Nevada*

Las Vegas (Moderate, &gt;12.7 ppm)

Clark County"

Las Vegas Valley Hydrographic Area 212

Reno (Moderate, 12.7 ppm)

Washoe County"

Truckee Meadows Hydrographic Area 87

*New Jersey*New York-Northern New Jersey-Long Island  
(Moderate, >12.7 ppm)

Bergen County

Essex County

Hudson County

Passaic County"

Clifton, Passaic, and Paterson

Union County

Philadelphia-Camden County (Moderate, 12.7 ppm)

Camden County

*New Mexico*

Albuquerque (Moderate, 12.7 ppm)

Bernalillo County

*New York*New York-Northern New Jersey-Long Island  
(Moderate, >12.7 ppm)

Bronx County

Kings County

Nassau County

New York County (Manhattan)

Queens County

Richmond County

Westchester County

Syracuse (Moderate, 12.7 ppm)

Onondaga County

*North Carolina*

Raleigh-Durham (Moderate, 12.7 ppm) (New')

Durham County

Wake County

Winston-Salem (Moderate, 12.7 ppm) (New')  
Forsyth County*Ohio*

Cleveland (Moderate, 12.7 ppm)

Cuyahoga County

*Oregon*

Grants Pass (Moderate, 12.7 ppm)

Josephine County"

Central Business District

Klamath Falls (Moderate, 12.7 ppm) (New')

Klamath County"

Urban Growth Boundary

Medford (Moderate, 12.7 ppm)

Jackson County"

Medford-Ashland Urban Growth Boundary

Portland-Vancouver (Moderate, 12.7 ppm)

Portland Metro Service District Boundary

Clackamas County"

Multnomah County"

Washington County"

*Pennsylvania*

Philadelphia-Camden County (Moderate, 12.7 ppm)

Philadelphia County"

Philadelphia—high-traffic areas within the Central  
Business District and certain other high-traffic density  
areas*Tennessee*

Memphis (Moderate, 12.7 ppm)

Shelby County

*Texas*

El Paso (Moderate, 12.7 ppm)

El Paso County"

Portion of the city limits of El Paso"

*Utah*

Ogden (Moderate, 12.7 ppm)

Weber County"

City of Ogden

Provo (Moderate, &gt;12.7 ppm)

Utah County"

City of Provo

*Virginia*

Washington (Moderate, 12.7 ppm)  
City of Alexandria and Arlington County

*Washington*

Portland-Vancouver (Moderate, 12.7 ppm)  
Clark County"  
Air Quality Maintenance Area  
Seattle-Tacoma (Moderate, >12.7 ppm)

Seattle-Tacoma urban area (as defined by the  
Washington Department of Transportation  
urban area maps)<sup>b</sup>  
King County"  
Pierce County"  
Snohomish County"  
Spokane (Moderate, >12.7 ppm)  
Spokane County"  
Spokane urban area (as defined by the Washington  
Department of Transportation urban area maps)



## Appendix F

### Nonattainment Areas for Particulate Matter (PM-10) Listed by State, County, and Municipality

*Alaska*

Anchorage  
Eagle River  
Juneau  
Mendenhall Valley Area

*Arizona*

Cochise County<sup>a</sup>  
Paul Spur/Douglas planning area<sup>b</sup>  
Gila County<sup>a</sup>  
Hayden-Miami planning area<sup>b</sup>  
Maricopa County<sup>a</sup>  
Phoenix planning area<sup>b</sup>  
Pima County<sup>a</sup>  
Rillito planning area<sup>b</sup>  
Ajo planning area<sup>b</sup>  
Pinal County<sup>a</sup>  
Phoenix planning area<sup>b</sup>  
Hayden-Miami planning area<sup>b</sup>  
Santa Cruz County<sup>a</sup>  
Nogales planning area<sup>b</sup>  
Yuma County<sup>a</sup>  
Yuma planning area<sup>b</sup>

*California*

Fresno County  
San Joaquin Valley planning area  
Imperial County  
Imperial Valley planning area  
Inyo County  
Owens Valley planning area  
Hydrologic Unit # 18090103  
Searles Valley planning area  
Hydrologic Unit # 18090205

*Kern County*

San Joaquin Valley planning area  
Searles Valley planning area  
Hydrologic Unit # 18090205

*Kings County*

San Joaquin Valley planning area

*Los Angeles County*

South Coast Air Basin

*Madera County*

San Joaquin Valley planning area

*Mono County*

Mammoth Lake planning area<sup>b</sup>

*Orange County*

South Coast Air Basin

*Riverside County*

Coachella Valley planning area  
South Coast Air Basin

*San Bernardino County*

Searles Valley planning area  
Hydrologic Unit # 18090205  
South Coast Air Basin

*San Joaquin County*

San Joaquin Valley planning area

*Stanislaus County*

San Joaquin Valley planning area

*Tulare County*

San Joaquin Valley planning area

*Colorado*

Adams County  
Denver Metro Area<sup>b</sup>  
Archeluta County  
Pagosa Springs  
Boulder County  
Denver Metro Area<sup>b</sup>  
Denver County  
Denver Metro Area<sup>b</sup>

*Note:* All PM-10 nonattainment areas are classified as moderate at this time.

<sup>a</sup> A portion of the county is located within the area and is designated nonattainment.

<sup>b</sup> For a description of the geographic boundary, see the *Federal Register* (56 FR 56694, November 6, 1991).

Douglas County  
 Denver Metro Area<sup>b</sup>  
 Fremont County  
 Canon City  
 Jefferson County  
 Denver Metro Area<sup>b</sup>  
 Pitkin County  
 Aspen  
 Prowers County  
 Lamar  
 San Miguel County  
 Telluride

#### *Connecticut*

New Haven County  
 New Haven

#### *Idaho*

Ada County<sup>a</sup>  
 Boise<sup>b</sup>  
 Bannock County<sup>a</sup>  
 Pocatello<sup>b</sup>  
 Bonner County<sup>a</sup>  
 Sandpoint Area<sup>b</sup>  
 Power County<sup>a</sup>  
 Pocatello<sup>b</sup>  
 Shoshone County  
 Pinehurst

#### *Illinois*

Cook County<sup>a</sup>  
 Lyons Township-McCook  
 Southeastern Chicago<sup>b</sup>  
 LaSalle County<sup>a</sup>  
 Oglesby<sup>b</sup>  
 Madison County<sup>a</sup>  
 Granite City  
 Nameoki

#### *Indiana*

Lake County<sup>a</sup>  
 East Chicago, Hammond, Gary, and Whiting  
 Vermillion County<sup>a</sup>  
 Clinton<sup>b</sup>

#### *Maine*

Aroostock County<sup>a</sup>  
 Presque Isle

#### *Michigan*

Detroit  
 Wayne County<sup>a, b</sup>

#### *Minnesota*

Olmsted County<sup>a</sup>  
 Rochester<sup>b</sup>  
 Ramsey County<sup>a</sup>  
 St. Paul<sup>b</sup>

#### *Montana*

Flathead County<sup>a, b</sup>  
 Columbia Falls and vicinity<sup>b</sup>  
 Kalispell  
 Lake County  
 Polson  
 Ronan  
 Lincoln County  
 Libby and vicinity<sup>b</sup>  
 Missoula County  
 Missoula and vicinity<sup>b</sup>  
 Rosebud County  
 Lame Deer  
 Silver Bow County<sup>a</sup>  
 Butte<sup>b</sup>

#### *Nevada*

Clark County  
 Las Vegas planning area  
 Hydrographic Area 212  
 Washoe County  
 Reno planning area  
 Hydrographic Area 87

#### *New Mexico*

Dona Ana County<sup>a</sup>  
 Anthony<sup>b</sup>



*Ohio*

Cuyahoga County  
Jefferson County<sup>a, b</sup>  
Mingo Junction

*Oregon*

Jackson County<sup>a</sup>  
Medford-Ashland AQMA (including White City)  
Josephine County<sup>a</sup>  
Grants Pass  
The area within the urban growth boundary  
Klamath County<sup>a</sup>  
Klamath Falls  
The area within the urban growth boundary  
Lane County<sup>a</sup>  
Springfield-Eugene  
The area within the urban growth boundary  
Union County<sup>a</sup>  
LaGrand  
The area within the urban growth boundary

*Pennsylvania*

Allegheny County<sup>a</sup>  
Clairton, Glassport, Liberty, Lincoln, and Port Vue

*Puerto Rico*

Guaynabo County

*Texas*

El Paso County  
El Paso

*Utah*

Salt Lake County  
Utah County

*Washington*

King County<sup>a</sup>  
Kent<sup>b</sup>  
Seattle<sup>b</sup>  
Pierce County<sup>a</sup>  
Tacoma<sup>b</sup>  
Spokane County<sup>a</sup>  
Spokane<sup>b</sup>  
Thurston County<sup>a</sup>  
Olympia-Tunwater-Lacey  
Walla Walla County<sup>a</sup>  
Walla  
Yakima County<sup>a</sup>  
Yakima<sup>b</sup>

*West Virginia*

Brooke County<sup>a</sup>  
Follansbee<sup>b</sup>

*Wyoming*

Sheridan County<sup>a</sup>  
Sheridan



## Appendix G

### Title III Hazardous Air Pollutants

Chemical Abstract Service (CAS) number	Chemical name	Chemical Abstract Service (CAS) number	Chemical name
75070	Acetaldehyde	67663	Chloroform
60355	Acetamide	107302	Chloromethyl methyl ether
75058	Acetonitrile	126998	Chloroprene
98862	Acetophenone	1319773	Cresols/Cresylic acid (isomers and mixture)
53963	2-Acetylaminofluorene		
107028	Acrolein	95487	o-Cresol
79064	Acrylamide	108394	m-Cresol
79107	Acrylic acid	106445	p-Cresol
107131	Acrylonitrile	98828	Cumene
107051	Allyl chloride	94757	2,4-D, salts and esters
92671	4-Aminobiphenyl	3547044	DDE
62533	Aniline	334883	Diazomethane
90040	o-Anisidine	132649	Dibenzofurans
1332214	Asbestos	96128	1,2-Dibromo-3-chloropropane
71432	Benzene (including benzene from gasoline)	84742	Dibutylphthalate
		106467	1,4-Dichlorobenzene(p)
92875	Benzidine	91941	3,3-Dichlorobenzidine
98077	Benzotrichloride	111444	Dichloroethyl ether (Bis(2-chloroethyl)ether)
100447	Benzyl chloride		
92524	Biphenyl	542756	1,3-Dichloropropene
117817	Bis(2-ethylhexyl) phthalate (DEHP)	62737	Dichlorvos
542881	Bis(chloromethyl)ether	111422	Diethanolamine
75252	Bromoform	121697	N,N-Diethyl aniline (N,N-Dimethylaniline)
106990	1,3-Butadiene		
156627	Calcium cyanamide	64675	Diethyl sulfate
105602	Caprolactam	119904	3,3-Dimethoxybenzidine
133062	Captan	60117	Dimethyl aminoazobenzene
63252	Carbaryl	119937	3,3'-Dimethyl benzidine
75150	Carbon disulfide	79447	Dimethyl carbamoyl chloride
56235	Carbon tetrachloride	68122	Dimethyl formamide
463581	Carbonyl sulfide	57147	1,1-Dimethyl hydrazine
120809	Catechol	131113	Dimethyl phthalate
133904	Chloramben	77781	Dimethyl sulfate
57749	Chlordane	534521	4,6-Dinitro-o-cresol, and salts
7782505	Chlorine	51285	2,4-Dinitrophenol
79118	Chloroacetic acid	121142	2,4-Dinitrotoluene
532274	2-Chloroacetophenone	123911	1,4-Dioxane
108907	Chlorobenzene		(1,4-Diethyleneoxide)
510156	Chlorobenzilate	122667	1,2-Diphenylhydrazine

Chemical Abstract Service (CAS) number	Chemical name	Chemical Abstract Service (CAS) number	Chemical name
106898	Epichlorohydrin (1-Chloro- 2,3-epoxypropane)	60344	Methyl hydrazine
106887	1,2-Epoxybutane	74884	Methyl iodide (Iodomethane)
140885	Ethyl acrylate	108101	Methyl isobutyl ketone (Hexone)
100414	Ethyl benzene	624839	Methyl isocyanate
51796	Ethyl carbamate (Urethane)	80626	Methyl methacrylate
75003	Ethyl chloride (Chloroethane)	1634044	Methyl tertiary butyl ether
106934	Ethylene dibromide (Dibromoethane)	101144	4,4-Methylene bis (2-chloroaniline)
107062	Ethylene dichloride (1,2-Dichloroethane)	75092	Methylene chloride (Dichloromethane)
107211	Ethylene glycol	101688	Methylene diphenyl diisocyanate (MDI)
151564	Ethylene imine (Aziridine)	101779	4,4'-Methylenedianiline
75218	Ethylene oxide	91203	Naphthalene
96457	Ethylene thiourea	98953	Nitrobenzene
75343	Ethylidene dichloride (1,1-Dichloroethane)	92933	4-Nitrobiphenyl
50000	Formaldehyde	100027	4-Nitrophenol
76448	Heptachlor	79469	2-Nitropropane
118741	Hexachlorobenzene	684935	N-Nitroso-N-methylurea
87683	Hexachlorobutadiene	62759	N-Nitrosodimethylamine
77474	Hexachlorocyclopentadiene	59892	N-Nitrosomorpholine
67721	Hexachloroethane	56382	Parathion
822060	Hexamethylene- 1,6-diisocyanate	82688	Pentachloronitrobenzene (Quintobenzene)
680319	Hexamethylphosphoramide	87865	Pentachlorophenol
110543	Hexane	108952	Phenol
302012	Hydrazine	106503	p-Phenylenediamine
7647010	Hydrochloric acid	75445	Phosgene
7664393	Hydrogen fluoride (Hydrofluoric acid)	7803512	Phosphine
123319	Hydroquinone	7723140	Phosphorous
78591	Isophorone	85449	Phthalic anhydride
58899	Lindane (all isomers)	1336363	Polychlorinated biphenyls (Aroclors)
108316	Maleic anhydride	1120714	1,3-Propane sultone
67561	Methanol	57578	beta-Propiolactone
72435	Methoxychlor	123386	Propionaldehyde
74839	Methyl bromide (Bromomethane)	114261	Propoxur (Baygon)
74873	Methyl chloride (Chloromethane)	78875	Propylene dichloride (1,2-Dichloropropane)
71556	Methyl chloroform (1,1,1-Trichloroethane)	75569	Propylene oxide
78933	Methyl ethyl ketone (2-Butanone)	75558	1,2-Propylenimine (2-Methylaziridine)
		91225	Quinoline
		106514	Quinone
		100425	Styrene



Chemical Abstract Service (CAS) number	Chemical name	Chemical Abstract Service (CAS) number	Chemical name
96093	Styrene oxide	1330207	Xylenes (isomers and mixture)
1746016	2,3,7,8-Tetrachlorodibenzo- p-dioxin	95476	o-Xylenes
79345	1,1,2,2-Tetrachloroethane	108383	m-Xylenes
127184	Tetrachloroethylene (Perchloroethylene)	106423	p-Xylenes
7550450	Titanium tetrachloride		Antimony compounds
108883	Toluene		Arsenic compounds (inorganic including arsine)
95807	2,4-Toluene diamine		Beryllium compounds
584849	2,4-Toluene diisocyanate		Cadmium compounds
95534	o-Toluidine		Chromium compounds
8001352	Toxaphene (chlorinated camphene)		Cobalt compounds
120821	1,2,4-Trichlorobenzene		Coke oven emissions
79005	1,1,2-Trichloroethane		Cyanide compounds <sup>a</sup>
79016	Trichloroethylene		Glycol ethers <sup>b</sup>
95954	2,4,5-Trichlorophenol		Lead compounds
88062	2,4,6-Trichlorophenol		Manganese compounds
121448	Triethylamine		Mercury compounds
1582098	Trifluralin		Fine mineral fibers <sup>c</sup>
540841	2,2,4-Trimethylpentane		Nickel compounds
108054	Vinyl acetate		Polycyclic organic matter <sup>d</sup>
593602	Vinyl bromide		Radionuclides
75014	Vinyl chloride		(including radon) <sup>e</sup>
75354	Vinylidene chloride (1,1-Dichloroethylene)		Selenium compounds

Source: Clean Air Act Amendments of 1990, section 301.

Note: For all listings that contain the word "compounds" and for glycol ethers, the following applies: Unless otherwise specified, these listings are defined as including any unique chemical substance that contains the named chemical (that is, antimony, arsenic, and so on) as part of that chemical's infrastructure.

<sup>a</sup> X'CN where X = H' or any other group where a formal dissociation may occur—for example, KCN or Ca(CN)<sub>2</sub>.

<sup>b</sup> Includes mono- and diethers of ethylene glycol, diethylene glycol, and triethylene glycol R-(OCH<sub>2</sub>CH<sub>2</sub>)<sub>n</sub>-OR' where n = 1, 2, or 3; R = alkyl or aryl groups; and R' = R, H, or groups that when removed yield glycol ethers with the structure (R-(OCH<sub>2</sub>CH)<sub>n</sub>-OH polymers are excluded from the glycol category).

<sup>c</sup> Includes glass microfibers, glass wool fibers, rock wool fibers, and slag wool fibers, each characterized as "respirable" (fiber diameter less than 3.5 micrometers) and possessing an aspect ratio (fiber length divided by fiber diameter) greater than 3.

<sup>d</sup> Includes organic compounds with more than one benzene ring and that have a boiling point greater than or equal to 100 C.

<sup>e</sup> A type of atom that spontaneously undergoes radioactive decay.





## Appendix H

### Clean Air Act Amendments of 1990 Class I and Class II Substances

Class I Substances <sup>a</sup>				
<i>Group I</i>	<i>Group II</i>	<i>Group III</i>	<i>Group IV</i>	<i>Group V</i>
CFC-11	Halon-1211	CFC-13	Carbon tetrachloride	Methyl chloroform
CFC-12	Halon-1301	CFC-111		
CFC-113	Halon-2402	CFC-112		
CFC-114		CFC-211		
CFC-115		CFC-212		
		CFC-213		
		CFC-214		
		CFC-215		
		CFC-216		
		CFC-217		
Class II Substances <sup>b</sup>				
HCFC-21		HCFC-142		HCFC-235
HCFC-22		HCFC-221		HCFC-241
HCFC-31		HCFC-222		HCFC-242
HCFC-121		HCFC-223		HCFC-243
HCFC-122		HCFC-224		HCFC-244
HCFC-123		HCFC-225		HCFC-251
HCFC-124		HCFC-226		HCFC-252
HCFC-131		HCFC-231		HCFC-253
HCFC-132		HCFC-232		HCFC-261
HCFC-133		HCFC-233		HCFC-262
HCFC-141		HCFC-234		HCFC-271

Source: Clean Air Act Amendments of 1990, sections 602(a) and (b).

<sup>a</sup> CFC stands for chlorofluorocarbon. The Amendments state: "The initial list under this subsection [of the act] shall also include the isomers of the substances listed above, other than 1,1,2-trichloroethane (an isomer of methyl chloroform). Pursuant to subsection (c), the [Environmental Protection Agency] Administrator shall add to the list of Class I substances any other substance that the Administrator finds causes or contributes significantly to harmful effects on the stratospheric ozone layer. The Administrator shall, pursuant to subsection (c), add to such list all substances that the Administrator determines have an ozone depletion potential of 0.2 or greater."

<sup>b</sup> HCFC stands for hydrochlorofluorocarbon. The Amendments state: "The initial list under this subsection [of the act] shall also include the isomers of the substances listed above. Pursuant to subsection (c), the [Environmental Protection Agency] Administrator shall add to the list of Class II substances any other substance that the Administrator finds is known or may reasonably be anticipated to cause or contribute to harmful effects on the stratospheric ozone layer."



## Appendix I

### Federal Contacts, State Environmental Agencies, and Regional Organizations

#### Federal Contacts

##### U.S. Postal Service

Central Region  
433 West Van Buren Street  
Chicago, IL 60699-0830  
(312) 765-5321

Eastern Region  
P.O. Box 8601  
Philadelphia, PA 19197-0820  
(215) 931-5003

Northeast Region  
6 Griffin Road, North  
Windsor, CT 06006-0820  
(203) 285-7017

Southern Region  
Mid-Memphis Tower  
1407 Union Avenue  
Memphis, TN 38166-0842  
(901) 722-7639

Western Region  
Mailstop WE43  
850 Cherry Avenue  
San Bruno, CA 94099-0843  
(415) 742-4860

##### U.S. Environmental Protection Agency

##### *Office of Air and Radiation*

*Assistant Administrator:* William G. Rosenberg  
*Deputy Assistant Administrator:* Michael J. Shapiro  
401 M Street, S.W.  
Washington, DC 20460  
(202) 260-7400

##### **Office of Program Management Operations**

*Acting Director:* Jerry Kurtzweg  
(202) 260-7415

##### **Office of Policy Analysis and Review**

*Director:* Robert D. Brenner  
(202) 260-5580

##### *Office of Air Quality Planning and Standards*

*Washington Operations Director:* Denise Devoe  
(202) 260-5575

##### **Air Quality Management Division**

Research Triangle Park, NC 27711

*Director:* John Calcagni

(919) 541-5551

*Ambient Standards Branch Acting Chief:* Michael Jones

(919) 541-5655

*Ozone/CO Programs Branch Chief:* Grady Helms

(919) 541-5527

*Ozone/CO issues:* Barry Gilbert or Valerie Broadwell

(919) 541-5238/3310

*Permits Programs Branch Chief:* Edward Lillis

(919) 541-5586

*Regional Operations Branch Chief:* Steve Hite

(919) 541-0886

*SO<sub>2</sub>/Particulate Matter Programs Branch Acting Chief:*

Joseph Paisie

(919) 541-5629

*Lead/SO<sub>x</sub> issues:* Laurie Ostrand

(919) 541-3277

*Particulate matter issues:* Larry Wallace

(919) 541-0906

*General issues:* Hank Young

(919) 541-5543

##### **Emissions Standards Division**

*Director:* Bruce Jordan

(919) 541-5571

##### **Stationary Source Compliance Division**

*Director:* John Rasnic

(703) 308-8672

*Deputy Director:* Richard Biondi

(703) 308-8672

*Compliance Monitoring Branch Chief:* Mamie Miller

(703) 308-8685

*Technical Support Branch Acting Chief:* Richard Biondi

(703) 308-8712

**Technical Support Division**

*Director:* William Laxton

(919) 541-5536

*Emissions Measurement Branch Chief:* Gilbert Wood

(919) 541-5544

*Monitoring and Reports Branch Chief:* William Hunt

(919) 541-5559

*National Air Data Bank Branch Chief:* John Bosch

(919) 541-5583

*Source Receptor Analysis Branch Chief:* Joe Tikvart

(919) 541-5561

**Office of Atmospheric and Indoor Air Programs**

*Director:* Eileen Claussen

(202) 260-7407

**Acid Rain Division**

*Director:* Brian McLean

(202) 260-9400

**Global Change Division**

*Director:* John Hoffman

(202) 260-7750

**Indoor Air Division**

*Director:* Robert Axelrad

(703) 308-8470

**Office of Mobile Sources**

*Director:* Richard Wilson

(202) 260-7645

*Assistant Director:* Don Zinger

(202) 260-7647

*Program Management Office Director:* Laszlo Bockh

(202) 260-4981

**Certification Division**

*Director:* Robert Maxwell

(313) 668-4464

**Emission Control Technology Division**

*Director:* Charles Gray, Jr.

(313) 668-4404

*Control Technology and Applications Branch Chief:*

Karl Hellman

(313) 668-4246

*Standards Development and Support Branch Chief:*

Chester France

(313) 668-4338

*Testing and Evaluation Branch Chief:* Lois Platte

(313) 668-4306

**Engineering Operations Division**

*Director:* Richard Lawrence

(313) 668-4243

**Field Operations and Support Division**

*Director:* Mary Smith

(202) 260-2633

*Field Operations and Compliance Branch Chief:*

Barry Nussbaum

(202) 2637

*Investigations and Enforcement Branch Chief:* Marc Hillson

(202) 260-2938

**Manufacturers Operations Division**

*Director:* Charles Freed

(202) 260-2479

**EPA Regional Offices****Region I (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont)**

J.F.K. Federal Building

Boston, MA 02203-2211

**Air Management Division**

*Director:* Linda Murphy

(617) 565-3800

*State Air Programs Branch Chief:* Susan Studlien

(617) 565-3245

*Technical Support Branch Chief:* Vacant

(617) 565-3221

**Region II (New Jersey, New York, Puerto Rico, and Virgin Islands)**

26 Federal Plaza

New York, NY 10278

**Office of Regional Counsel**

*Air, Waste, and Toxic Substances Branch Chief:*

William Sawyer

(212) 264-5340

**Air and Waste Management Division**

*Director:* Conrad Simon

(212) 264-2301

*Deputy Director:* Shelley Holm

(212) 264-3082

*Air Programs Branch Chief:* William Baker

(212) 264-2517

*Air Compliance Branch Chief:* Kenneth Eng

(212) 264-9627

**Region III (Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia)**

841 Chestnut Building  
Philadelphia, PA 19107

**Office of Regional Counsel**

*Air and Toxics Branch Chief:* Cynthia Giles  
(215) 597-3439

**Air, Toxics, and Radiation Division**

*Director:* Thomas Maslaney

(215) 597-9390

*Deputy Director:* Eleanor McCann

(215) 597-9862

*Air Programs Branch Chief:* Marcia Spink

(215) 597-9075

*Air Enforcement Branch Chief:* Bernard Turlinski

(215) 597-3989

**Region IV (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee)**

345 Courtland Street, N.E.  
Atlanta, GA 30365

**Office of Regional Counsel**

*Air, Water, Toxics, and General Law Branch Chief:*  
William Anderson  
(404) 347-2335

**Air, Pesticides, and Toxics Management Division**

*Director:* Winston Smith

(404) 347-3043

*Deputy Director:* Bruce Miller

(404) 347-3043

*Air Programs Branch Chief:* Douglas Neeley

(404) 347-2864

*Air Compliance Branch Chief:* Jewell Harper

(404) 347-2904

**Region V (Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin)**

230 South Dearborn Street  
Chicago, IL 60604

**Office of Regional Counsel**

*Air, Water, Toxics, and General Law Branch Chief:*  
Michael Smith  
(312) 886-6776

**Air and Radiation Division**

*Director:* David Kee

(312) 353-2212

*Air Toxics and Radiation Branch Chief:* Gary Gulezian

(312) 353-9538

*Regulation Development Branch Chief:* Steven Rothblatt

(312) 886-6260

*Air Enforcement Branch Chief:* George Czerniak

(312) 886-6781

**Region VI (Arkansas, Louisiana, New Mexico, Oklahoma, and Texas)**

1445 Ross Avenue  
Dallas, TX 75202-2733

**Air, Pesticides, and Toxics Division**

*Director:* A. Stanley Meiburg

(214) 655-7200

*Air Programs Branch Chief:* Gerald Fontenot

(214) 655-7204

*Air Enforcement Branch Chief:* John Hepola

(214) 655-7220

**Region VII (Iowa, Kansas, Missouri, and Nebraska)**

726 Minnesota Avenue  
Kansas City, KS 66101

**Office of Regional Counsel**

*Air and Toxic Materials Branch Chief:* Robert Patrick  
(913) 551-7010

**Air and Toxics Division**

*Director:* William Spratlin

(913) 551-7020

*Air Branch Chief:* Gale Right

(913) 551-7020

**Region VIII (Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming)**

999 18th Street  
Denver Place, Suite 500  
Denver, CO 80202-2405

**Office of Regional Counsel**

*Media Programs Branch Chief:* Chris Phillips  
(303) 293-7572

**Air, Radiation, and Toxics Division**

*Director:* Pat Hull

(303) 293-7572

*Deputy Director:* Jack Hiding  
(303) 293-1440

*Air Programs Branch Chief:* Douglas Skie  
(303) 293-1750

*Technical Operations Branch Chief:* Marshall Payne  
(303) 293-0950

**Region IX (Arizona, California, Guam, Hawaii, and Nevada)**

75 Hawthorne Street  
San Francisco, CA 94105

**Air and Toxics Division**

*Director:* David Howekamp  
(415) 744-1530

*Deputy Director:* Carl Konert  
(415) 744-1530

*Air Planning Branch Chief:* David Calkins  
(415) 744-1218

*Stationary Source Branch Chief:* Kenneth Bigos  
(415) 744-1245

*Office of Radiation and Indoor Air Chief:*  
Michael Bandrowski  
(415) 744-1048

**Region X (Alaska, Idaho, Oregon, and Washington)**

1200 Sixth Avenue  
Seattle, WA 98101

**Air and Toxics Division**

*Director:* Jim McCormick  
(206) 553-4152

*Air and Radiation Branch Chief:* George Abel  
(206) 553-4166

**State Environmental Agencies**

**Alabama**

Department of Environmental Management  
Air Division  
1751 Cong. W.L. Dickenson Drive  
Montgomery, AL 36130  
Telephone: (205) 271-7861  
Fax: (205) 271-7950  
*Chief:* Richard E. Grusnick

*Acid Deposition:* Nate Hartman  
*Enforcement:* Ron Gore  
*Implementation Plans:* Ken Barrett  
*Indoor Air Pollution:* Lud Hoffman  
*Mobile Sources:* Jeff Walker  
*Monitoring:* Tim Owen

*New Source Review:* Ron Gore  
*Ozone/Carbon Monoxide:* Jeff Walker  
*Particulate Matter:* Ken Barrett  
*Permitting:* Ron Gore  
*Program Funding:* Freddie Thomas  
*Public Information:* Catherine Lamar  
*Stratospheric Ozone:* Jeff Walker  
*Toxics:* Jeff Walker  
*Training:* Freddie Walker

**Alaska**

Department of Environmental Conservation  
Air Quality Management Section  
P.O. Box 0  
Juneau, AK 99811-1800  
Telephone: (907) 465-5100  
Fax: (907) 465-5098 or (907) 586-5274  
*Chief:* Leonard D. Verrelli

*Acid Deposition:* John Stone  
*Enforcement:* Tom Chapple  
*Implementation Plans:* Leonard D. Verrelli  
*Mobile Sources:* Ron King  
*Monitoring:* Gerry Guay  
*New Source Review:* Tom Chapple  
*Ozone/Carbon Monoxide:* Ron King  
*Particulate Matter:* Gerry Guay  
*Permitting:* Tom Chapple  
*Program Funding:* Leonard D. Verrelli  
*Public Information:* Jane Paulsen  
*Stratospheric Ozone:* John Stone  
*Toxics:* John Stone

**American Samoa**

Environmental Quality Commission  
Governor's Office  
Pago Pago, American Samoa  
Telephone: 011 (684) 633-4116  
*Executive Secretary:* Pati Faiai

**Arizona**

Department of Environmental Quality  
Office of Air Quality  
3033 N. Central Avenue  
Phoenix, AZ 85012  
Telephone: (602) 257-2308  
Fax: (602) 528-5945  
*Assistant Director:* Nancy Wrona



*Acid Deposition:* Gary Neuroth  
*Enforcement:* William P. Jasper  
*Implementation Plans:* Ira Domskey  
*Mobile Sources:* William Watson  
*Monitoring:* Gary Neuroth  
*New Source Review:* Prabhat Bhargava  
*Ozone/Carbon Monoxide:* Gary Neuroth  
*Particulate Matter:* Gary Neuroth  
*Permitting:* Prabhat Bhargava  
*Program Funding:* Ira Domskey  
*Public Information:* John Godec  
*Stratospheric Ozone:* Kathryn Stevens  
*Toxics:* Gary Neuroth  
*Training:* Paul Donovan

### Arkansas

Department of Pollution Control and Ecology  
 Air Division  
 8001 National Drive, P.O. Box 9583  
 Little Rock, AR 72209  
 Telephone: (501) 562-7444  
 Fax: (501) 562-4632  
 Chief: James B. Jones

*Acid Deposition:* John Mitchell  
*Enforcement:* J.D. McClanahan  
*Implementation Plans:* Courtney Garland  
*Mobile Sources:* Mike Porta  
*Monitoring:* Mitchell Stroh  
*New Source Review:* David Morrow  
*Ozone/Carbon Monoxide:* Mark McCorkle  
*Particulate Matter:* Elaine Wachowiak  
*Permitting:* Cecil D. Harrell  
*Program Funding:* Cathalene Purvis  
*Public Information:* Becky Allison  
*Stratospheric Ozone:* Mike Porta  
*Toxics:* Mike Porta

### California

Air Resources Board  
 P.O. Box 2815  
 Sacramento, CA 95812  
 Telephone: (916) 445-4383  
 Fax: (916) 322-6003  
*Executive Officer:* James D. Boyd  
*Deputy Executive Officer:* Thomas Cackette

*Acid Deposition:* John Holmes  
*Enforcement:* James Morgester  
*Implementation Plans:* Catherine Witherspoon  
*Indoor Air Pollution:* John Holmes

*Mobile Sources:* Don Drachanel  
*Monitoring:* Bill Loscutoff  
*New Source Review:* Peter Venturini  
*Ozone/Carbon Monoxide:* Mike Scheible  
*Particulate Matter:* Mike Scheible  
*Permitting:* Peter Venturini  
*Program Funding:* Mike Scheible  
*Public Information:* Bill Sessa  
*Stratospheric Ozone:* John Holmes  
*Toxics:* Peter Venturini  
*Training:* James Morgester

### Colorado

Department of Health  
 Air Pollution Control Division  
 4210 East 11th Avenue  
 Denver, CO 80220  
 Telephone: (303) 331-8500  
 Fax: (303) 320-4079  
*Acting Division Director:* John Leary

*Acid Deposition:* Sheila Burns  
*Enforcement:* Dave Ouimette  
*Implementation Plans:* Rich Halvey  
*Indoor Air Pollution:* Steven Arnold  
*Mobile Sources:* Jerry Gallagher  
*Monitoring:* Steven Arnold  
*New Source Review:* Jim Geier  
*Ozone/Carbon Monoxide:* Steven Arnold  
*Particulate Matter:* Steven Arnold  
*Permitting:* Jim Geier  
*Program Funding:* Rich Halvey  
*Public Information:* Laura Bishard  
*Stratospheric Ozone:* Steven Arnold  
*Toxics:* John Clouse  
*Training:* Ray Mohr

### Connecticut

Department of Environmental Protection  
 Bureau of Air Management  
 165 Capitol Avenue  
 Hartford, CT 06106  
 Telephone: (203) 566-2506  
 Fax: (203) 566-6144  
*Chief:* Carl S. Pavetto

*Acid Deposition:* Carl S. Pavetto  
*Enforcement:* Steven E. Peplau  
*Implementation Plans:* Richard Soj  
*Mobile Sources:* Joe Belanger  
*Monitoring:* John "Jack" Williams

*New Source Review:* David Wackter  
*Ozone/Carbon Monoxide:* Phil Florkowski  
*Particulate Matter:* Phil Florkowski  
*Permitting:* David Wackter  
*Program Funding:* Carl S. Pavetto  
*Public Information:* Carl S. Pavetto  
*Stratospheric Ozone:* John Gove  
*Toxics:* Gudman Lovvoll  
*Training:* Robert Sargis

**Delaware**

Department of Natural Resources  
and Environmental Control  
Division of Air and Waste Management  
Air Resources Section  
89 Kings Highway, P.O. Box 1401  
Dover, DE 19903  
Telephone: (302) 739-4791  
Fax: (302) 739-5060  
*Program Administrator:* Phillip G. Retallick

*Acid Deposition:* Robert J. Taggart  
*Enforcement:* Robert J. Taggart  
*Implementation Plans:* Raymond H. Malenfant  
*Mobile Sources:* Raymond H. Malenfant  
*Monitoring:* Joseph J. Kliment  
*New Source Review:* Robert J. Taggart  
*Ozone/Carbon Monoxide:* Raymond H. Malenfant  
*Particulate Matter:* Joseph J. Kliment  
*Permitting:* Robert J. Taggart  
*Program Funding:* Raymond H. Malenfant  
*Public Information:* David Small  
*Stratospheric Ozone:* Alfred Deramo  
*Toxics:* Ali Mirzakhali  
*Training:* Penny Gentry

**District of Columbia**

Department of Consumer and Regulatory Affairs  
Environmental Control Division  
Air Quality Control and Monitoring Branch  
2100 Martin Luther King Avenue, S.E.  
Washington, DC 20020  
Telephone: (202) 404-1120  
Fax: (202) 404-1188  
*Chief:* Joseph K. Nwude

*Acid Deposition:* Donald Wambsgans/David Krask  
*Enforcement:* William Gillespie/Donald Wambsgans  
*Implementation Plans:* Donald Wambsgans  
*Indoor Air Pollution:* David Krask  
*Mobile Sources:* Donald Wambsgans

*Monitoring:* David Krask/Robert Day  
*New Source Review:* Donald Wambsgans/William Gillespie  
*Ozone/Carbon Monoxide:* Donald Wambsgans/David Krask  
*Particulate Matter:* Donald Wambsgans/David Krask  
*Permitting:* Donald Wambsgans/Modupe Babalola  
*Program Funding:* Joseph K. Nwude/David Krask  
*Public Information:* Joseph K. Nwude/William Gillespie  
*Stratospheric Ozone:* Joseph K. Nwude/David Krask  
*Toxics:* David Krask  
*Training:* Khin Sann Thauung

**Florida**

Department of Environmental Regulation  
Air Resources Management  
2600 Blair Stone Road  
Twin Towers Office Building  
Tallahassee, FL 32399-2400  
Telephone: (904) 488-1344  
Fax: (904) 487-4938  
*Division Director:* Steve Smallwood

*Acid Deposition:* Tom Rogers  
*Enforcement:* James Pennington  
*Implementation Plans:* Roy Weber  
*Indoor Air Pollution:* John Glunn  
*Mobile Sources:* Bob Daugherty  
*Monitoring:* William Blommel  
*New Source Review:* James Pennington  
*Ozone/Carbon Monoxide:* Larry George  
*Particulate Matter:* Barry Andrews  
*Permitting:* Willard Hanks  
*Program Funding:* Steve Smallwood  
*Public Information:* John Glunn  
*Stratospheric Ozone:* Larry George  
*Toxics:* John Glunn  
*Training:* Lola Kilpatrick

**Georgia**

Department of Natural Resources  
Environmental Protection Division  
Air Protection Branch  
205 Butler Street, S.E., Room 1162  
Atlanta, GA 30334  
Telephone: (404) 656-6900  
Fax: (404) 651-9425  
*Branch Chief:* Robert H. Collom, Jr.

*Acid Deposition:* Edward A. "Tony" Cutrer  
*Enforcement:* Marvin M. Lowry  
*Implementation Plans:* Robert H. Collom, Jr.  
*Indoor Air Pollution:* William D. Estes

*Mobile Sources:* Thomas J. Teston  
*Monitoring:* Rafael Ballagas  
*New Source Review:* Marvin M. Lowry  
*Ozone/Carbon Monoxide:* Ronald C. Methier  
*Particulate Matter:* Ronald C. Methier  
*Permitting:* Marvin M. Lowry  
*Program Funding:* Robert H. Collom, Jr.  
*Public Information:* Thomas Smith  
*Stratospheric Ozone:* Robert H. Collom, Jr.  
*Toxics:* Robert H. Collom, Jr.  
*Training:* William D. Estes

**Guam**

Environmental Protection Agency  
Complex Unit D-107  
130 Rojas Street  
Harmon, Guam 96911  
Telephone: 011 (671) 646-8863

**Hawaii**

State Department of Health  
Laboratories Division  
Air Surveillance and Analysis Branch  
1270 Queen Emma Street, Suite 900  
Honolulu, HI 96813  
Telephone: (808) 586-4019  
Fax: (808) 586-3983  
*Chief:* Richard Sasaki

*Enforcement:* Kathy Hendricks  
*Implementation Plans:* Paul Aki  
*Mobile Sources:* Wilfred Nagamine/Richard Sasaki  
*Monitoring:* Richard Sasaki  
*New Source Review:* Wilfred Nagamine  
*Ozone/Carbon Monoxide:* Richard Sasaki  
*Particulate Matter:* Richard Sasaki  
*Permitting:* Wilfred Nagamine  
*Program Funding:* Paul Aki  
*Public Information:* Paul Aki  
*Toxics:* Wilfred Nagamine  
*Training:* Paul Aki/Richard Sasaki

**Idaho**

Division of Environmental Quality  
Air Quality Bureau  
1410 North Hilton, 3rd Floor  
Boise, ID 83706  
Telephone: (208) 334-5898  
Fax: (208) 334-0417  
*Chief:* John D. Ledger

*Acid Deposition:* Chris Johnson  
*Enforcement:* Dave Pisarski  
*Implementation Plans:* Helen Rigg  
*Mobile Sources:* Helen Rigg  
*Monitoring:* Dave Pisarski  
*New Source Review:* Martin Bauer  
*Ozone/Carbon Monoxide:* Dave Pisarski  
*Particulate Matter:* Tim Trumbull  
*Permitting:* Brian Munson  
*Program Funding:* John Sandoval  
*Public Information:* John D. Ledger  
*Stratospheric Ozone:* Dave Pisarski  
*Toxics:* Robert Wilkosz  
*Training:* Kathy Osbourne

**Illinois**

Environmental Protection Agency  
Division of Air Pollution Control  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276  
Telephone: (217) 782-7326  
Fax: (217) 782-2465  
*Manager:* Bharat Mathur

*Acid Deposition:* Dennis Lawler  
*Enforcement:* Robert Sharpe  
*Implementation Plans:* Toby Frevert/Dennis Lawler  
*Indoor Air Pollution:* John Reed  
*Mobile Sources:* Toby Frevert/Tom Wallin (I&M)  
*Monitoring:* Terry Sweitzer  
*New Source Review:* Chris Romaine  
*Ozone/Carbon Monoxide:* Dennis/Toby Frevert  
*Particulate Matter:* Dennis Lawler  
*Permitting:* Don Sutton  
*Program Funding:* Willa Barger  
*Public Information:* Maggie Catt  
*Stratospheric Ozone:* John Reed  
*Toxics:* Miles Zamco  
*Training:* John Reed

**Indiana**

Department of Environmental Management  
Office of Air Management  
P.O. Box 6015  
105 South Meridian Street  
Indianapolis, IN 46206-6015  
Telephone: (317) 232-8384  
Fax: (317) 232-5539  
*Acting Assistant Commissioner:* Paul Dubenetzky

*Acid Deposition:* Lisa Tavormina  
*Enforcement:* Woodard Smith  
*Implementation Plans:* Paul Dubenetzky  
*Indoor Air Pollution:* Jon Bates  
*Mobile Sources:* Michael Worrell  
*Monitoring:* Ed Stresino  
*New Source Review:* John Doss  
*Ozone/Carbon Monoxide:* Michael Worrell  
*Particulate Matter:* Larry Fedor  
*Permitting:* John Doss  
*Program Funding:* David Rice  
*Public Information:* Bettie Cadou  
*Stratospheric Ozone:* Jon Bates  
*Toxics:* Larry Fedor  
*Training:* Brenda Simpson

### Iowa

Department of Natural Resources  
 Air Quality Section  
 Henry Wallace Building  
 900 East Grand  
 Des Moines, IA 50319  
 Telephone: (515) 281-8852  
 Fax: (515) 281-8895  
 Chief: Pete Hamlin

*Acid Deposition:* Joe Griffin  
*Enforcement:* Doug Campbell  
*Implementation Plans:* Christine Spackman  
*Mobile Sources:* Kate Bason  
*Monitoring:* George Welch  
*Permitting:* Bill Youngquist  
*Program Funding:* George Welch  
*Stratospheric Ozone:* Kate Bason  
*Toxics:* Christine Spackman

### Kansas

Department of Health and Environment  
 Bureau of Air and Waste Management  
 Forbes Field, Building 740  
 Topeka, KS 66620  
 Telephone: (913) 296-1593  
 Fax: (913) 296-6247  
 Director: John C. Irwin

*Acid Deposition:* Harish Agarwal  
*Enforcement:* Frank Layman  
*Implementation Plans:* John Irwin  
*Indoor Air Pollution:* Jan Sides  
*Mobile Sources:* Harish Agarwal  
*Monitoring:* Jan Sides

*New Source Review:* Harish Agarwal  
*Ozone/Carbon Monoxide:* John Irwin  
*Particulate Matter:* John Irwin  
*Permitting:* Harish Agarwal  
*Program Funding:* John Irwin  
*Public Information:* Frank Layman  
*Stratospheric Ozone:* Harish Agarwal  
*Toxics:* John Irwin  
*Training:* Jan Sides

### Kentucky

Department for Environmental Protection  
 Division for Air Quality  
 316 St. Clair Mall  
 Frankfort, KY 40601  
 Telephone: (502) 564-3382  
 Fax: (502) 564-3787  
 Acting Division Director: Hisham M. Saaid

*Acid Deposition:* Kenneth Hines  
*Enforcement:* Miles Smith  
*Implementation Plans:* Gregory Copley  
*Indoor Air Pollution:* Lona Brewer  
*Mobile Sources:* Martin Luther  
*Monitoring:* Diana Andrews  
*New Source Review:* James Dills  
*Ozone/Carbon Monoxide:* Gregory Copley  
*Particulate Matter:* Gregory Copley  
*Permitting:* James Dills  
*Program Funding:* Sandra Jackson  
*Public Information:* Eva Smith-Carroll  
*Stratospheric Ozone:* Lona Brewer  
*Toxics:* Hisham Saaid  
*Training:* Sandra Jackson

### Louisiana

Department of Environmental Quality  
 Office of Air Quality and Radiation Protection  
 Air Quality Division  
 P.O. Box 82135  
 Baton Rouge, LA 70884-2135  
 Telephone: (504) 765-0110  
 Fax: (504) 765-0222  
 Administrator: Gustave Von Bodungen

*Acid Deposition:* Bob Hannah  
*Enforcement:* Chris Roberie  
*Implementation Plans:* Gustave Von Bodungen/  
 Tom Coerver  
*Indoor Air Pollution:* Gustave Von Bodungen  
*Mobile Sources:* Phil Eckert

*Monitoring:* Bob Hannah  
*New Source Review:* Larry Devillier  
*Ozone/Carbon Monoxide:* Gustave Von Bodungen/  
Tom Coerver  
*Particulate Matter:* Kevin Sweeney/Bill Hopkins  
*Permitting:* Larry Devillier  
*Program Funding:* Kevin Sweeney/Bill Hopkins  
*Public Information:* Kevin Sweeney/Bill Hopkins  
*Stratospheric Ozone:* Gustave Von Bodungen/Tom Coerver  
*Toxics:* Chris Roberie  
*Training:* Chris Handrich

## Maine

Department of Environmental Protection  
Bureau of Air Quality Control  
State House, Station 17  
Augusta, ME 04333  
Telephone: (207) 289-2437  
Fax: (207) 289-7641  
*Director:* Dennis L. Keschl

*Acid Deposition:* Carolyn Wheeler  
*Enforcement:* Kevin MacDonald  
*Implementation Plans:* Ron Severance  
*Indoor Air Pollution:* Richard Greves/Ron Severance  
*Mobile Sources:* Ron Severance  
*Monitoring:* Leighton Carver  
*New Source Review:* Mark Cone  
*Ozone/Carbon Monoxide:* Ron Severance  
*Particulate Matter:* Ron Severance  
*Permitting:* Bryce Sproul  
*Program Funding:* Jim Brooks  
*Public Information:* Jim Brooks  
*Stratospheric Ozone:* Ron Severance  
*Toxics:* Richard Greves  
*Training:* Jim Brooks

## Maryland

Department of the Environment  
Air Management Administration  
2500 Broening Highway  
Baltimore, MD 21224  
Telephone: (301) 631-3255  
Fax: (301) 631-3202  
*Director:* George P. Ferreri

*Acid Deposition:* William Paul  
*Enforcement:* Ronald Lipinski  
*Implementation Plans:* Mario Jorquera  
*Mobile Sources:* Daniel Meszler  
*Monitoring:* Edward Carter

*New Source Review:* Donald Andrew  
*Ozone/Carbon Monoxide:* Diane Franks  
*Particulate Matter:* Diane Franks  
*Permitting:* Ronald Lipinski  
*Program Funding:* Susan Wierman  
*Public Information:* Dorothy Guy  
*Stratospheric Ozone:* Donald Andrew  
*Toxics:* Tad Aburn  
*Training:* Katherine Wilhelm

## Massachusetts

Department of Environmental Protection  
Division of Air Quality Control  
One Winter Street, 8th Floor  
Boston, MA 02108  
Telephone: (617) 292-5630  
Fax: (617) 556-1049  
*Acting Director:* Barbara A. Kwetz

*Acid Deposition:* Thomas DeNormandie  
*Enforcement:* Karen Regas  
*Implementation Plans:* Laurel Carlson  
*Mobile Sources:* James Neely  
*Monitoring:* Donald Steele  
*New Source Review:* Donald Squires  
*Ozone/Carbon Monoxide:* Laurel Carlson  
*Particulate Matter:* Nick Stratis  
*Permitting:* Robert Donaldson  
*Program Funding:* William Kacher  
*Public Information:* Ellen Robertson  
*Stratospheric Ozone:* Ellen Robertson  
*Toxics:* Donald Robertson  
*Training:* Herbert Redman

## Michigan

Department of Natural Resources  
Air Quality Division  
P.O. Box 30028  
Lansing, MI 48909  
Telephone: (517) 373-7023  
Fax: (517) 373-1265; E-Mail: EPX 3161  
*Chief:* Robert Miller

*Acid Deposition:* Paul Shutt  
*Enforcement:* Barbara Rosenbaum  
*Implementation Plans:* Jon Trout  
*Indoor Air Pollution:* Steve Kish  
*Mobile Sources:* Robert Rusch  
*Monitoring:* John Schroeder  
*New Source Review:* David Yanochko  
*Ozone/Carbon Monoxide:* Jon Trout

*Particulate Matter:* Steve Kish  
*Permitting:* David Yanocho  
*Program Funding:* Joe Taylor  
*Public Information:* Laura DeGuire  
*Stratospheric Ozone:* Craig Fitzner  
*Toxics:* Jerry Avery/Catherine Simon  
*Training:* Becky Patrick

### Minnesota

Pollution Control Agency  
 Air Quality Division  
 520 Lafayette Road North  
 St. Paul, MN 55155  
 Telephone: (612) 296-7331  
 Fax: (612) 297-1456  
*Director:* Lisa Thorvig

*Acid Deposition:* Rick Strassman  
*Enforcement:* Bob Berg  
*Implementation Plans:* Pat Mulloy  
*Indoor Air Pollution:* Laura Oatman  
*Mobile Sources:* Barb Jackson  
*Monitoring:* Gary Eckhardt  
*New Source Review:* Ahto Niemioja  
*Ozone/Carbon Monoxide:* Barb Jackson  
*Particulate Matter:* John Seltz  
*Permitting:* Joel Smith  
*Program Funding:* Lisa Thorvig  
*Public Information:* Susan Brustman  
*Stratospheric Ozone:* Greg Pratt  
*Toxics:* Paul Gerbec  
*Training:* Bob King

### Mississippi

Department of Environmental Quality  
 Bureau of Pollution Control  
 Air Division  
 P.O. Box 10385  
 Jackson, MS 39289  
 Telephone: (601) 961-5171  
 Fax: (601) 961-5190  
*Chief:* Dwight Wylie

*Acid Deposition:* (Mr.) Connie J. Simmons  
*Enforcement:* Wayne B. Anderson  
*Implementation Plans:* Connie Simmons  
*Indoor Air Pollution:* Denny S. Jackson  
*Mobile Sources:* Connie J. Simmons  
*Monitoring:* Mike Norcom  
*New Source Review:* Don Watts  
*Ozone/Carbon Monoxide:* Connie Simmons

*Particulate Matter:* Connie Simmons  
*Permitting:* Don Watts  
*Program Funding:* Dwight Wylie  
*Public Information:* Eleana Turner  
*Stratospheric Ozone:* Danny Jackson  
*Toxics:* Dwight Wylie

### Missouri

Department of Natural Resources  
 Division of Environmental Quality  
 Air Pollution Control Program  
 P.O. Box 176  
 Jefferson City, MO 65102  
 Telephone: (314) 751-4817  
 Fax: (314) 751-2706  
*Staff Director:* Cindi Kemper

*Acid Deposition:* Al Dusheke  
*Enforcement:* Mike Tharpe  
*Implementation Plans:* Randy Raymond  
*Indoor Air Pollution:* Calvin Ku  
*Mobile Sources:* Macey Jett  
*Monitoring:* Cheryl Hickman  
*New Source Review:* Todd Crawford  
*Ozone/Carbon Monoxide:* Randy Raymond  
*Particulate Matter:* Randy Raymond/Steve Feeler  
*Permitting:* Todd Crawford  
*Program Funding:* Cindi Kemper  
*Public Information:* Bill Palmer  
*Stratospheric Ozone:* Gene Cassin  
*Toxics:* Calvin Ku  
*Training:* Janice Eggen

### Montana

Department of Health and Environmental Sciences  
 Air Quality Bureau  
 Cogswell Building, Room A116  
 Helena, MT 59620  
 Telephone: (406) 444-3454  
 Fax: (406) 444-1374  
*Chief:* Jeffrey Chaffee

*Acid Deposition:* Jeffrey Chaffee  
*Enforcement:* Harry Keltz  
*Implementation Plans:* Bob Raisch  
*Mobile Sources:* Bob Raisch  
*Monitoring:* Stan Sternberg  
*New Source Review:* Jan Sensibaugh  
*Ozone/Carbon Monoxide:* Bob Raisch  
*Particulate Matter:* Bob Raisch  
*Program Funding:* Jeffrey Chaffee

*Public Information:* Kay Johnson  
*Toxics:* Bob Raisch  
*Training:* Jeffrey Chaffee

**Nebraska**

Department of Environmental Control  
Air Quality Division  
301 Centennial Mall South  
Box 98922  
Lincoln, NE 68509-8922  
Telephone: (402) 471-2189  
Fax: (402) 471-2909  
*Chief:* Gene Robinson

*Acid Deposition:* Gene Robinson  
*Enforcement:* Jim Yeggy  
*Implementation Plans:* Gene Robinson  
*Mobile Sources:* Gene Robinson  
*Monitoring:* Linda McCrory  
*New Source Review:* Jim Fobben  
*Ozone/Carbon Monoxide:* Gene Robinson  
*Particulate Matter:* Gene Robinson  
*Permitting:* Jim Fobben  
*Program Funding:* Gene Robinson  
*Public Information:* Brian McManus  
*Stratospheric Ozone:* Gene Robinson  
*Toxics:* Jim Fobben  
*Training:* Gene Robinson

**Nevada**

Division of Environmental Protection  
Bureau of Air Quality  
123 West Nye Lane  
Carson City, NV 89710  
Telephone: (702) 687-5065  
Fax: (702) 885-0868  
*Bureau Chief:* Lowell H. Shifley, Jr.

*Acid Deposition:* Lowell Shifley  
*Enforcement:* Tom Porta  
*Implementation Plans:* Sandi Carroll  
*Indoor Air Pollution:* Tom Porta  
*Mobile Sources:* Jim Brandmueller  
*Monitoring:* Robert Smith  
*New Source Review:* Greg Remer  
*Ozone/Carbon Monoxide:* Lowell Shifley  
*Particulate Matter:* Lowell Shifley  
*Permitting:* Gay McCleary  
*Program Funding:* Lowell Shifley  
*Public Information:* Lowell Shifley  
*Stratospheric Ozone:* Sandi Carroll

*Toxics:* Sandi Carroll  
*Training:* Robert Smith

**New Hampshire**

Air Resources Division  
64 North Main Street  
Caller Box 2033  
Concord, NH 03301  
Telephone: (603) 271-1370  
Fax: (603) 271-1381  
*Director:* Dennis R. Lunderville

*Acid Deposition:* Dennis R. Lunderville  
*Enforcement:* Jack Glenn  
*Implementation Plans:* Thomas Noel  
*Indoor Air Pollution:* Max Hilgemeier  
*Mobile Sources:* Gilbert Cox  
*Monitoring:* Paul Sanborn  
*New Source Review:* Andrew Bodnarik  
*Ozone/Carbon Monoxide:* Gilbert Cox  
*Particulate Matter:* Andrew Bodnarik  
*Permitting:* Craig Wright  
*Program Funding:* Dennis R. Lunderville  
*Public Information:* Chuck Knox  
*Stratospheric Ozone:* Ann McGahan  
*Toxics:* Richard Andrews  
*Training:* Donald Davis

**New Jersey**

Department of Environmental Protection and Energy  
Office of Energy  
401 East State Street, 7th Floor West  
Trenton, NJ 08625  
Telephone: (609) 292-6710  
Fax: (609) 633-6198  
*Assistant Director:* John Elston

*Acid Deposition:* Greg John  
*Enforcement:* Donald Patterson  
*Implementation Plans:* Chris Salmi  
*Indoor Air Pollution:* Joann Held  
*Mobile Sources:* David West  
*Monitoring:* Charles Pietarinen  
*New Source Review:* Lou Mikolajczyk  
*Ozone/Carbon Monoxide:* Chris Salmi  
*Particulate Matter:* Joann Held  
*Permitting:* Lou Mikolajczyk  
*Program Funding:* John Fabarno  
*Public Information:* Elaine Makatura  
*Stratospheric Ozone:* Chris Salmi

*Toxics:* Olga Boyko  
*Training:* Elaine Makatura

**New Mexico**

Environment Department  
Environmental Protection Division  
Air Quality Bureau  
Harold Runnels Building, Room S2100  
P.O. Box 26110  
Santa Fe, NM 87502  
Telephone: (505) 827-0070  
Fax: (505) 827-0045  
*Chief:* Cecilia Williams

*Enforcement:* Gian Baciglsupa  
*Implementation Plans:* Albion Carlson  
*Monitoring:* Martin Rinaldi  
*New Source Review:* Bruce Nicholson  
*Ozone/Carbon Monoxide:* Martin Rinaldi  
*Particulate Matter:* Lany Weaver  
*Permitting:* Bruce Nicholson  
*Program Funding:* Cecilia Williams

**New York**

Department of Environmental Conservation  
Division of Air Resources  
50 Wolf Road  
Albany, NY 12233-3250  
Telephone: (518) 457-7230  
Fax: (518) 457-0794  
*Director:* Thomas M. Allen

*Acid Deposition:* David Shaw  
*Enforcement:* John Davis  
*Implementation Plans:* David Shaw  
*Mobile Sources:* Dr. Richard Gibbs  
*Monitoring:* Donald Gower  
*New Source Review:* Arthur Fossa  
*Ozone/Carbon Monoxide:* David Shaw  
*Particulate Matter:* David Shaw  
*Permitting:* Arthur Fossa  
*Program Funding:* Kristine Kelly  
*Public Information:* Barbara Allen  
*Stratospheric Ozone:* Dr. S.T. Rao  
*Toxics:* Patrick Lavin  
*Training:* Raymond Bell

**North Carolina**

Department of Environment, Health, and Natural Resources  
Air Quality Section  
P.O. Box 27687  
Raleigh, NC 27611  
Telephone: (919) 733-3340  
Fax: (919) 733-5317; E-Mail: EPX 4211  
*Chief:* Lee A. Daniel

*Acid Deposition:* Russell Hageman  
*Enforcement:* Lee A. Daniel  
*Implementation Plans:* Russell Hageman  
*Indoor Air Pollution:* Russell Hageman  
*Mobile Sources:* Donnie Redmond  
*Monitoring:* George C. Murray  
*New Source Review:* Laura S. Butler  
*Ozone/Carbon Monoxide:* George C. Murray  
*Particulate Matter:* George C. Murray  
*Permitting:* Laura S. Butler  
*Program Funding:* Lee A. Daniel  
*Public Information:* Debbie Crane  
*Stratospheric Ozone:* Russell Hageman  
*Toxics:* Earl McCune  
*Training:* Earl McCune

**North Dakota**

Department of Health  
Division of Environmental Engineering  
1200 Missouri Avenue, Room 304  
P.O. Box 5520  
Bismarck, ND 58502-5520  
Telephone: (701) 221-5188  
Fax: (701) 221-5200  
*Director:* Dana K. Mount

*Acid Deposition:* Charles McDonald  
*Enforcement:* Bill Delmore  
*Implementation Plans:* Terry O'Clair  
*Indoor Air Pollution:* Jim Semerad  
*Mobile Sources:* Tom Bachman  
*Monitoring:* Charles McDonald/Tom Bachman  
*New Source Review:* Tom Bachman  
*Ozone/Carbon Monoxide:* Charles McDonald  
*Particulate Matter:* Charles McDonald  
*Permitting:* Tom Bachman  
*Program Funding:* Dana K. Mount  
*Public Information:* Terry O'Clair  
*Stratospheric Ozone:* Tom Bachman  
*Toxics:* Craig Thorstenson  
*Training:* Terry O'Clair



**Ohio**

Environmental Protection Agency  
Division of Air Pollution Control  
1800 Watermark Drive  
Columbus, OH 43266-0149  
Telephone: (614) 644-2270  
Fax: (614) 644-2329  
Chief: Patricia Walling-Miller

*Acid Deposition:* Bill Spires  
*Enforcement:* Jim Orlemann  
*Implementation Plans:* Jim Orlemann  
*Indoor Air Pollution:* Paul Koval  
*Mobile Sources:* Scott Compton  
*Monitoring:* Gary Engler  
*New Source Review:* Bob Hodonbosi  
*Ozone/Carbon Monoxide:* Bob Hodonbosi  
*Particulate Matter:* Jim Orlemann  
*Permitting:* Clara Dailey  
*Program Funding:* Patricia Walling-Miller  
*Public Information:* Patricia Walling-Miller  
*Stratospheric Ozone:* Bill Spires  
*Toxics:* Paul Koval  
*Training:* Tom Rigo

**Oklahoma**

Department of Health  
Air Quality Service  
1000 N.E. 10th Street  
P.O. Box 53551  
Oklahoma City, OK 73152  
Telephone: (405) 271-5220  
Fax: (405) 271-7339  
Chief: John Drake

*Acid Deposition:* John Drake  
*Enforcement:* Doyle McWhirter  
*Implementation Plans:* Larry Byrum  
*Indoor Air Pollution:* Consumer Protection Service  
*Mobile Sources:* Larry Byrum  
*Monitoring:* Larry Byrum  
*New Source Review:* Doyle McWhirter  
*Ozone/Carbon Monoxide:* Larry Byrum  
*Particulate Matter:* Larry Byrum  
*Permitting:* Doyle McWhirter  
*Program Funding:* John Drake  
*Public Information:* Dick Gunn  
*Stratospheric Ozone:* Dr. Nancy Coleman  
*Toxics:* Dr. Nancy Coleman  
*Training:* John Drake

**Oregon**

Department of Environmental Quality  
Air Quality Control Division  
811 S.W. 6th Avenue  
Portland, OR 97204  
Telephone: (503) 229-5287  
Fax: (503) 229-6124  
Administrator: Steve Greenwood

*Acid Deposition:* Gregg Lande  
*Enforcement:* Tom Bispham/Wendy Sims/Sarah Armitage  
*Implementation Plans:* Merlyn Hough  
*Indoor Air Pollution:* Sarah Armitage  
*Mobile Sources:* Howard Harris  
*Monitoring:* Monica Russell  
*New Source Review:* Wendy Sims  
*Ozone/Carbon Monoxide:* Howard Harris  
*Particulate Matter:* Merlyn Hough  
*Permitting:* Wendy Sims  
*Program Funding:* Steve Greenwood  
*Public Information:* John Mackellar  
*Stratospheric Ozone:* Gregg Lande  
*Toxics:* Gregg Lande  
*Training:* Kevin Downing

**Pennsylvania**

Department of Environmental Resources  
Bureau of Air Quality Control  
101 South 2nd Street, Executive House, Room 116  
Harrisburg, PA 17105  
Telephone: (717) 787-9702  
Fax: (717) 772-2303  
Acting Chief: William A. Thompson

*Acid Deposition:* Gary Triplett  
*Enforcement:* Doug Leshner  
*Implementation Plans:* Gary Triplett  
*Mobile Sources:* Gary Triplett  
*Monitoring:* Ben Brodovicz  
*New Source Review:* Doug Leshner/Kirshnan Ramamurthy  
*Ozone/Carbon Monoxide:* Gary Triplett  
*Particulate Matter:* Gary Triplett/Ben Brodovicz  
*Permitting:* Doug Leshner/Kirshnan Ramamurthy  
*Program Funding:* William A. Thompson  
*Public Information:* Gary Triplett  
*Stratospheric Ozone:* Gary Triplett  
*Toxics:* Robert Kulp  
*Training:* William A. Thompson

**Puerto Rico**

Environmental Quality Board  
Air and Water Division  
Del Parque Street, #204  
Corner Pumarada Street  
Santurce, PR 00910  
Telephone: (809) 767-8071  
Associate Director: Lorenzo R. Iglesias

**Rhode Island**

Department of Environmental Management  
Division of Air and Hazardous Materials  
291 Promenade Street  
Providence, RI 02908-5767  
Telephone: (401) 277-2808  
Fax: (401) 277-2017  
Chief: Thomas D. Getz

*Acid Deposition:* Stephen Majkut  
*Enforcement:* Ted Burns  
*Implementation Plans:* Barbara Morin  
*Indoor Air Pollution:* Department of Health  
*Mobile Sources:* Stephen Majkut  
*Monitoring:* John Cucco  
*New Source Review:* Douglas L. McVay  
*Ozone/Carbon Monoxide:* Stephen Majkut  
*Particulate Matter:* Stephen Majkut  
*Permitting:* Douglas L. McVay  
*Program Funding:* Stephen Majkut  
*Public Information:* Stephen Majkut  
*Toxics:* Barbara Morin  
*Training:* Stephen Majkut

**South Carolina**

Department of Health and Environmental Control  
Bureau of Air Quality Control  
2600 Bull Street  
Columbia, SC 29201  
Telephone: (803) 734-4750  
Fax: (803) 734-4556  
Chief: James A. Joy III

*Acid Deposition:* Otto E. Pearson  
*Enforcement:* William P. Brantley  
*Implementation Plans:* Jack Thornberry  
*Indoor Air Pollution:* James A. Joy III  
*Mobile Sources:* Jack Thornberry  
*Monitoring:* Gene C. Slice  
*New Source Review:* Max Batavia/Robert Wood  
*Ozone/Carbon Monoxide:* Jack Thornberry

*Particulate Matter:* Jack Thornberry  
*Permitting:* Max Batavia/Robert Wood  
*Program Funding:* Jack Thornberry  
*Public Information:* James A. Joy III  
*Stratospheric Ozone:* Jack Thornberry  
*Toxics:* Max Batavia/J. Preston Campbell  
*Training:* Jack Thornberry

**South Dakota**

Department of Environment and Natural Resources  
Point Source Control Program  
523 East Capitol Avenue, Joe Foss Building  
Pierre, SD 57501  
Telephone: (605) 773-3351  
Fax: (605) 773-6035  
Chief: Brad Schultz

*Acid Deposition:* Brian Gustafson  
*Enforcement:* Tim Rogers  
*Implementation Plans:* Brian Gustafson  
*Indoor Air Pollution:* Brad Schultz  
*Mobile Sources:* Keith Gestring  
*Monitoring:* Brad Schultz  
*New Source Review:* Keith Gestring  
*Ozone/Carbon Monoxide:* Brad Schultz  
*Particulate Matter:* Brad Schultz  
*Permitting:* Keith Gestring  
*Program Funding:* Tim Tollefsrud  
*Public Information:* Brad Schultz  
*Stratospheric Ozone:* Brian Gustafson  
*Toxics:* Mike Pochop  
*Training:* Tim Tollefsrud

**Tennessee**

Department of Environment and Conservation  
Division of Air Pollution Control  
Customs House, Fourth Floor  
701 Broadway  
Nashville, TN 37243-1531  
Telephone: (615) 741-3931  
Fax: (615) 741-4666  
Director: Harold Hodges

*Acid Deposition:* Eric R. Flowers  
*Enforcement:* Quincy N. Styke  
*Implementation Plans:* John W. Walton  
*Indoor Air Pollution:* Jackie L. Waynick  
*Mobile Sources:* John W. Walton  
*Monitoring:* Jackie L. Waynick  
*New Source Review:* David G. Carson  
*Ozone/Carbon Monoxide:* John W. Walton

*Particulate Matter:* David G. Carson  
*Permitting:* Barry R. Stephens  
*Program Funding:* C. Ron Culberson  
*Public Information:* C. Ron Culberson  
*Stratospheric Ozone:* Jackie L. Waynick  
*Toxics:* John W. Walton  
*Training:* C. Ron Culberson

## Texas

Air Control Board  
12124 Park 35 Circle  
Austin, TX 78753  
Telephone: (512) 908-1000  
Fax: (512) 908-1935  
*Executive Director:* Steve Spaw

*Acid Deposition:* Randy Hamilton  
*Enforcement:* Walter Bradley  
*Implementation Plans:* Lane Hartsock  
*Mobile Sources:* Russ Baier  
*Monitoring:* Doyle Pendleton  
*New Source Review:* Lawrence Pewitt  
*Ozone/Carbon Monoxide:* Lane Hartsock  
*Particulate Matter:* David Harper  
*Permitting:* Lawrence Pewitt  
*Program Funding:* Paul Henry  
*Public Information:* Steve Davis  
*Stratospheric Ozone:* Herb Williams  
*Toxics:* Jeff Grief  
*Training:* Lee Engle

## Utah

Department of Environmental Quality  
Division of Air Quality  
1950 West North Temple  
Salt Lake City, UT 84114-4820  
Telephone: (801) 536-4000  
Fax: (801) 538-4099  
*Director:* F. Burnell Cordner

*Acid Deposition:* Lindy Stankov  
*Enforcement:* Jeff Dean  
*Implementation Plans:* Dave McNeil  
*Mobile Sources:* Barbara Cole  
*Monitoring:* Robert Bailey  
*New Source Review:* Don Robinson  
*Ozone/Carbon Monoxide:* Dave McNeil  
*Particulate Matter:* Montie Keller  
*Permitting:* Don Robinson  
*Program Funding:* Marvin Maxwell  
*Public Information:* Sandy Daw

*Stratospheric Ozone:* Dave McNeil  
*Toxics:* Steven Packham  
*Training:* Montie Keller

## Vermont

Agency of Natural Resources  
Air Pollution Control Division  
103 South Main Street, Building 3 South  
Waterbury, VT 05676  
Telephone: (802) 244-8731  
Fax: (802) 244-5141  
*Director:* Richard Valentinetti

*Acid Deposition:* Richard Poirot  
*Enforcement:* Christian B. Jones  
*Implementation Plans:* Paul Wishinski  
*Mobile Sources:* John Perreault  
*Monitoring:* Greg Heil  
*New Source Review:* Brian Fitzgerald  
*Ozone/Carbon Monoxide:* Harold Garabedian  
*Particulate Matter:* Paul Wishinski  
*Permitting:* Brian Fitzgerald  
*Program Funding:* Richard Valentinetti  
*Public Information:* Lisa Lovely  
*Stratospheric Ozone:* Harold Garabedian  
*Toxics:* Brian Fitzgerald  
*Training:* Harold Garabedian

## Virginia

Department of Air Pollution Control  
P.O. Box 10089  
Richmond, VA 23240  
Telephone: (804) 786-2378  
Fax: (804) 225-3933  
*Executive Director:* Wallace N. Davis

*Acid Deposition:* Daniel Salkovitz  
*Enforcement:* John "Jack" E. Schubert  
*Implementation Plans:* Robert A. Mann, Jr.  
*Indoor Air Pollution:* Nancy S. Saylor  
*Mobile Sources:* Richard Olin  
*Monitoring:* Bill Parks  
*New Source Review:* Sandy Morse  
*Ozone/Carbon Monoxide:* Ellen P. Snyder  
*Particulate Matter:* Robert A. Mann, Jr.  
*Permitting:* Sandy Morse  
*Program Funding:* William J. Bulluck  
*Public Information:* Mary E. Major  
*Stratospheric Ozone:* John "Jack" E. Schubert  
*Toxics:* John "Jack" E. Schubert  
*Training:* E. Jonathan Johnson

**Virgin Islands**

Department of Planning and Natural Resources  
Division of Environmental Protection  
Watergut Homes 1118  
Christiansted, St. Croix  
US VI 00820-5065  
Telephone: (809) 773-0565  
Fax: (809) 773-3343 or 773-9310  
*Air Pollution Engineer:* Todd Shank

**Washington**

Department of Ecology  
Air Program  
P.O. Box 47600  
Olympia, WA 98504-7600  
Telephone: (206) 459-6632  
Fax: (206) 438-7484  
*Air Program Manager:* Stuart A. Clark

*Acid Deposition:* Stuart A. Clark  
*Enforcement:* Grant Pfeifer  
*Implementation Plans:* Dan Johnson  
*Mobile Sources:* John Raymond  
*Monitoring:* Bob Miller  
*New Source Review:* Myron Saikewicz  
*Ozone/Carbon Monoxide:* Dan Johnson  
*Particulate Matter:* Dan Johnson  
*Permitting:* Dave Bradley  
*Program Funding:* Joseph Williams  
*Public Information:* Phyllis Baas  
*Stratospheric Ozone:* Stuart A. Clark  
*Toxics:* Chris Figueroa  
*Training:* Phyllis Baas

**West Virginia**

Air Pollution Control Commission  
1558 Washington Street, East  
Charleston, WV 25311  
Telephone: (304) 558-2275  
Fax: (304) 348-3287  
*Director:* G. Dale Farley

*Acid Deposition:* G. Dale Farley  
*Enforcement:* Robert Weser  
*Implementation Plans:* John Benedict  
*Mobile Sources:* John Benedict  
*Monitoring:* Charles Spann  
*New Source Review:* David Porter  
*Ozone/Carbon Monoxide:* John Benedict  
*Particulate Matter:* John Benedict

*Program Funding:* G. Dale Farley  
*Public Information:* G. Dale Farley  
*Toxics:* G. Dale Farley  
*Training:* G. Dale Farley

**Wisconsin**

Department of Natural Resources  
Bureau of Air Management (AM/10)  
P.O. Box 7921  
Madison, WI 53707  
Telephone: (608) 266-7718  
Fax: (608) 267-0560  
*Director:* Donald F. Theiler

*Acid Deposition:* Julian Chazin  
*Enforcement:* Dean Packard  
*Implementation Plans:* Jon Heinrich  
*Indoor Air Pollution:* Julian Chazin  
*Mobile Sources:* Larry Bruss  
*Monitoring:* Julian Chazin  
*New Source Review:* Dale Ziege  
*Ozone/Carbon Monoxide:* Jon Heinrich  
*Particulate Matter:* Jon Heinrich  
*Permitting:* Dale Ziege  
*Program Funding:* Robert Bolongia  
*Public Information:* Anne Urbanski  
*Stratospheric Ozone:* Julian Chazin  
*Toxics:* Dean Packard  
*Training:* Penny Kanable

**Wyoming**

Air Quality Division  
122 West 25th Street  
Cheyenne, WY 82002  
Telephone: (307) 777-7391  
Fax: (307) 777-5973  
*Administrator:* Charles Collins

*Acid Deposition:* Charles Collins  
*Enforcement:* Charles Collins  
*Implementation Plans:* Charles Collins  
*Indoor Air Pollution:* Kathryn Blaney  
*Monitoring:* Bob Schick  
*New Source Review:* Bernie Dailey  
*Particulate Matter:* Bernie Dailey  
*Permitting:* Bernie Dailey  
*Program Funding:* Charles Collins  
*Toxics:* Bernie Dailey  
*Training:* Charles Collins

**Regional Organizations***State Organizations*

Northeast States for Coordinated Air Use Management (NESCAUM)  
129 Portland Street  
Boston, MA 02114  
Telephone: (617) 367-8540  
Fax: (617) 742-9162

*Executive Director:* Michael Bradley

Southeast States Air Resource Managers (SESARM)  
Department of Environmental Management  
Air Division  
1751 Cong. W.L. Dickenson Drive  
Montgomery, AL 36130  
Telephone: (205) 271-7861  
*Chairman:* Richard Grusnick

Western States Air Resources Council (WESTAR)  
1001 S.W. 5th Avenue, Suite 1000  
Portland, OR 97204  
Telephone: (503) 220-1660  
Fax: (503) 220-1651  
*Director:* John Core

Lake Michigan Air Directors Consortium (LADCO)  
2350 East Devon Avenue, Suite 242  
Des Plaines, IL 60018  
Telephone: (708) 296-2181  
Fax: (708) 296-2958  
*Executive Director:* Steve Gerritson

*State and Local Organizations*

Mid-Atlantic Regional Air Management Association (MARAMA)  
Delaware Department of Natural Resources and Environmental Control  
89 Kings Highway, P.O. Box 1401  
Dover, DE 19903  
Telephone: (302) 736-4791  
*Chairman:* Robert French

*Local Organizations*

California Air Pollution Control Officers Association (CAPCOA)  
3232 Western Drive  
Cameron Park, CA 95682  
Telephone: (916) 676-4323  
Fax: (916) 676-0325  
*Executive Director:* Stewart Wilson

Metro IV (Region IV Local Air Pollution Control Agencies)  
Jefferson County Department of Health  
Bureau of Environmental Health  
P.O. Box 2648  
Birmingham, AL 35202-2648  
Telephone: (205) 930-1207  
Fax: (205) 939-3019  
*Chairman:* Henry U. Burnett

Ohio Local Air Pollution Control Officers Association (OLAPCOA)  
Canton City Health Department  
Air Pollution Control Division  
City Hall, 218 Cleveland Avenue  
Canton, OH 44702  
Telephone: (216) 489-3385  
*Chairman:* Bruce Blankenship

Region 5, ALAPCO  
Indianapolis Air Pollution Control Division  
2700 South Belmont Avenue  
Indianapolis, IN 46221  
Telephone: (317) 633-5496  
*Chairman:* David Jordan



**Appendix J****Local Air Quality Management Districts and Air Pollution Control Officials**

(organizations under each state are listed in alphabetical order by city)

**Alabama**

Jefferson County Department of Health  
Bureau of Environmental Health  
P.O. Box 2648  
Birmingham, AL 35202-2648  
Telephone: (205) 933-9110  
Fax: (205) 939-3019  
*Director:* James Carroll

City of Huntsville  
Department of Natural Resources and  
Environmental Management  
305 Church Street  
Huntsville, AL 35801  
Telephone: (205) 535-4206  
Fax: (205) 535-4212  
*Director:* I.N. Vaughan

**Alaska**

Anchorage Air Pollution Control Agency  
Department of Health and Human Services  
P.O. Box 196650  
Anchorage, AK 99519-6650  
Telephone: (907) 343-4713  
Fax: (907) 258-6379  
*Manager:* Stephen Morris

Fairbanks North Star Borough  
Department of Health and Safety  
P.O. Box 71267  
Fairbanks, AK 99707  
Telephone: (907) 459-1000  
Fax: (907) 459-1330  
*Contact:* Kelly A. McMullen

**American Samoa**

Refer to the territory listing in Appendix I

**Arizona**

Coconino County Air Pollution Control District  
Environmental Health Service  
2500 N. Ft. Valley Road  
Flagstaff, AZ 86001  
Telephone: (602) 779-5164  
*Director:* Dean R. Abbott

Pinal-Gila Counties Air Quality Control District  
P.O. Box 1076  
Florence, AZ 85232  
Telephone: (602) 868-5801  
*Contact:* Martin Godusi

Maricopa County Bureau of Air Pollution Control  
2406 South 24th Street, Suite E-214  
Phoenix, AZ 85034  
Telephone: (602) 506-6700  
Fax: (602) 506-6862  
*Air Pollution Control Officer:* Ted Williams

Pima County Department of Environmental Quality  
150 West Congress, 5th Floor  
Tucson, AZ 85701  
Telephone: (602) 740-8803  
*Director:* David Esposito

**Arkansas**

Refer to the state listing in Appendix I

**California**

Modoc County Air Pollution Control District  
202 West Fourth Street  
Alturas, CA 96101  
Telephone: (916) 233-3939  
Fax: (916) 233-5542  
*Air Pollution Control Officer:* Clinton B. Greenbank

## Placer County Air Pollution Control District

11484 B Avenue

Auburn, CA 95603

Telephone: (916) 889-7130

*Acting Air Pollution Control Officer: James H. Humphries*

## Kern County Air Pollution Control District

2700 M Street, Suite 275

Bakersfield, CA 93301

Telephone: (805) 861-3682

Fax: (805) 861-2060

*Air Pollution Control Officer: William J. Roddy*

## Great Basin Unified Air Pollution Control District

157 Short Street, Suite 6

Bishop, CA 93514

Telephone: (619) 872-8211

Fax: (619) 872-6109

*Air Pollution Control Officer: Ellen Hardebeck*

## Colusa County Air Pollution Control District

Air Quality Standards

100 Sunrise Boulevard, Suite F

Colusa, CA 95932

Telephone: (916) 458-5891

Fax: (916) 458-5000

*Director: Harry A. Krug*

## South Coast Air Quality Management District

21865 E. Copley Drive

Diamond Bar, CA 91765-4182

Telephone: (714) 396-2100

Fax: (714) 396-3340

*Executive Officer: James M. Lents*

## Butte County Air Pollution Control District

9287 Midway, Suite 1A

Durham, CA 95938

Telephone: (916) 891-2882

Fax: (916) 891-2878

*Air Pollution Control Officer: Gina Facca*

## Imperial County Air Pollution Control District

150 South Ninth Street

El Centro, CA 92243

Telephone: (619) 339-4606

Fax: (619) 353-9420

*Air Pollution Control Officer: Stephen Birdsall*

## North Coast Unified Air Quality Management District

5630 South Broadway

Eureka, CA 95501

Telephone: (707) 443-3093

Fax: (707) 443-3091

*Air Pollution Control Officer: Wayne Morgan*

## Fresno County Air Pollution Control District

P.O. Box 11867

Fresno, CA 93775

Telephone: (209) 445-3239

Fax: (209) 445-3370

*Air Quality Control Chief: Robert C. Dowell*

## Santa Barbara County Air Pollution Control District

26 Castilian, Suite B23

Goleta, CA 93117

Telephone: (805) 961-8800

Fax: (805) 961-8801

*Air Pollution Control Officer: James M. Ryerson*

## Northern Sierra Air Quality Management District

P.O. Box 2509

Grass Valley, CA 95945

Telephone: (916) 265-1398

Fax: (916) 265-1264

*Air Pollution Control Officer: Russell A. Roberts*

## Kings County Air Pollution Control District

330 Campus Drive

Hanford, CA 93230

Telephone: (209) 584-1411

*Air Pollution Control Officer: Dennis Otani*

## Northern Sonoma County Air Pollution Control District

109 North Street

Healdsburg, CA 95448

Telephone: (707) 433-5911

Fax: (707) 433-4823

*Air Pollution Control Officer: Michael Tolmasoff*

## Amador County Air Pollution Control District

108 Court Street

Jackson, CA 95642

Telephone: (209) 223-6406



*Air Pollution Control Officer:* Roxanne Keith  
Lake County Air Quality Management District  
883 Lakeport Boulevard  
Lakeport, CA 95453  
Telephone: (707) 263-7000  
Fax: (707) 263-1052

*Air Pollution Control Officer:* Robert L. Reynolds

Madera County Air Pollution Control District  
135 West Yosemite Avenue  
Madera, CA 93637  
Telephone: (209) 675-7823  
Fax: (209) 661-4213  
*Deputy Air Pollution Control Officer:* James Blanton

Mariposa County Air Pollution Control District  
P.O. Box 5  
Mariposa, CA 95338  
Telephone: (209) 966-3689  
*Air Pollution Control Officer:* Cliff Lyons

Merced County Air Pollution Control District  
385 East 13th Street  
Merced, CA 95340  
Telephone: (209) 385-7391  
Fax: (209) 384-1593  
*Manager:* Roland D. Brooks

Stanislaus County Air Pollution Control District  
1716 Morgan Road  
Modesto, CA 95351  
Telephone: (209) 525-4152  
Fax: (209) 525-4163  
*Deputy Air Pollution Control Officer:* Mark Boese

Monterey Bay Unified Air Pollution Control District  
24580 Silver Cloud Court  
Monterey, CA 93940-6536  
Telephone: (408) 647-9411  
Fax: (408) 647-8501  
*Executive Officer:* Abra Bennett

El Dorado County Air Pollution Control District  
7563 Green Valley Road  
Placerville, CA 95667  
Telephone: (916) 621-5897  
*Air Pollution Control Program Coordinator:*  
James Thompson

Tehama County Air Pollution Control District  
P.O. Box 38  
Red Bluff, CA 96080  
Telephone: (916) 527-4504

*Air Pollution Control Officer:* Donald W. Hill  
Shasta County Air Quality Management District  
1415 West Street  
Redding, CA 96001  
Telephone: (916) 225-5674  
*Air Pollution Control Officer:* R. Michael Kussow

Sacramento Metropolitan Air Quality Management District  
8411 Jackson Road  
Sacramento, CA 95826  
Telephone: (916) 386-6182  
Fax: (916) 386-6674  
*Air Pollution Control Officer:* Norm Covell

Calaveras County Air Pollution Control District  
Government Center  
San Andreas, CA 95249  
Telephone: (209) 754-3742  
*Contact:* Robert E. Marshall

San Diego County Air Pollution Control District  
9150 Chesapeake Drive  
San Diego, CA 92123-1095  
Telephone: (619) 694-3307  
Fax: (619) 694-2730  
*Air Pollution Control Officer:* Richard J. Sommerville

Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
Telephone: (415) 771-6000  
Fax: (415) 928-8560  
*Air Pollution Control Officer:* Milton Feldstein

San Luis Obispo County Air Pollution Control District  
2156 Sierra Way, Suite B  
San Luis Obispo, CA 93401  
Telephone: (805) 549-5912  
Fax: (805) 546-1035  
*Director:* Robert W. Carr

Tuolumne County Air Pollution Control District  
2 South Green Street  
Sonora, CA 95370  
Telephone: (209) 533-5691  
Fax: (209) 533-5520  
*Air Pollution Control Officer:* Gerald A. Benincasa

San Joaquin County Air Pollution Control District  
2321 W. Washington, Suite 1  
P.O. Box 2009  
Stockton, CA 95201  
Telephone: (209) 468-3470  
Fax: (209) 943-7248

*Director:* Lakhmir Grewal  
Lassen County Air Pollution Control District  
175 Russell Avenue  
Susanville, CA 96130  
Telephone: (916) 257-8311  
*Contact:* Kenneth R. Smith

Mendocino County Air Pollution Control District  
890 N. Bush Street  
Courthouse Square  
Ukiah, CA 95482  
Telephone: (707) 463-4354  
*Air Pollution Control Officer:* David Faulkner

Ventura County Air Pollution Control District  
702 County Square Drive  
Ventura, CA 93003  
Telephone: (805) 654-1400  
Fax: (805) 654-1444  
*Air Pollution Control Officer:* Richard H. Baldwin

San Bernardino County Air Pollution Control District  
15428 Civic Drive, Suite 200  
Victorville, CA 92392  
Telephone: (619) 243-8920  
Fax: (619) 243-8925  
*Air Pollution Control Officer:* Chuck Fryxell

Tulare County Air Pollution Control District  
County Civic Center  
Visalia, CA 93291  
Telephone: (209) 733-6441  
Fax: (209) 733-6932  
*Air Pollution Control Officer:* David W. Fishel

Glenn County Air Pollution Control District  
P.O. Box 351  
Willows, CA 95988  
Telephone: (916) 934-6500  
Fax: (916) 934-6503  
*Air Pollution Control Officer:* Ed Romano

Yolo-Solano Air Pollution Control District  
P.O. Box 1006  
Woodland, CA 95695  
Telephone: (916) 668-6700  
Fax: (916) 668-6710  
*Air Pollution Control Officer:* Kenneth Selover

Siskiyou County Air Pollution Control District  
525 South Foothill Drive  
Yreka, CA 96097  
Telephone: (916) 842-8029  
Fax: (916) 842-6690  
*Air Pollution Control Officer:* Edmond W. Hale  
Feather River Air Quality Management District  
463 Palora Avenue  
Yuba City, CA 95991  
Telephone: (916) 741-6484  
Fax: (916) 743-4442  
*Air Pollution Control Officer:* Kenneth Corbin

### Colorado

Boulder County Health Department  
3450 North Broadway  
Boulder, CO 80304  
Telephone: (303) 441-1182  
Fax: (303) 441-1289  
*Environmental Health Specialist:* Diane Niemiec

El Paso County Department of Health and Environment  
501 North Foote Avenue  
Colorado Springs, CO 80909  
Telephone: (719) 578-3137  
*Air Quality Program Supervisor:* John R. James

Denver Department of Health and Hospitals  
Environmental Programs  
605 Bannock Street, #1426  
Denver, CO 80204  
Telephone: (303) 893-6243  
Fax: (303) 436-5974  
*Director:* Steven J. Foute

Regional Air Quality Council  
2480 W. 26th Avenue, #330-B  
Denver, CO 80211  
Telephone: (303) 480-1550  
Fax: (303) 480-1128  
*Contact:* Ken Lloyd

Tri-County Health Department  
5950 S. Willow Drive, Suite 200  
Englewood, CO 80111-1628  
Telephone: (303) 741-5050  
*Director of Environmental Health:* Chris Wiant

Larimer County Health Department  
363 Jefferson Street  
Fort Collins, CO 80524  
Telephone: (303) 221-7497  
*Air Pollution Control Specialist: Myrna Jamison Hansen*

City of Fort Collins  
Department of Natural Resources  
P.O. Box 580  
Fort Collins, CO 80522  
Telephone: (303) 221-6604  
*Air Quality Coordinator: Brian Woodruff*

Mesa County Health Department  
515 Patterson Road  
Grand Junction, CO 81501  
Telephone: (303) 244-1745  
*Air Pollution Control Specialist: Steven L. DeFeyer*

Weld County Health Department  
1517 16th Avenue Court  
Greeley, CO 80631  
Telephone: (303) 353-0635  
Fax: (303) 356-4966  
*Air Quality Control Specialist: Jeffrey Stoll*

Jefferson County Health Department  
Air Pollution Control Section  
260 S. Kipling  
Lakewood, CO 80226  
Telephone: (303) 232-6301  
*Contact: Cliff Myers*

Pueblo City-County Health Department  
151 Central Main Street  
Pueblo, CO 81003  
Telephone: (719) 544-8376  
*Assistant Director of Health Protection: Dutch Gruse*

### Connecticut

Environmental Health  
Office of Humane Affairs  
752 E. Main Street  
Bridgeport, CT 06608  
Telephone: (203) 576-7451  
*Director: Henry Gross*

Bristol-Burlington Health District  
240 Stafford Avenue  
Bristol, CT 06010-4617  
Telephone: (203) 584-7682  
*Contact: William E. Furniss, M.S., M.D.*

Greenwich Health Department  
Town Hall Annex  
Greenwich, CT 06830  
Telephone: (203) 622-7843  
*Air Quality Supervisor: Arthur Morris*

City of Meriden Department of Health and Human Services  
Division of Health  
165 Miller Street  
Meriden, CT 06450  
Telephone: (203) 630-4226  
*Chief of Environmental Health: David J. Rogers*

Department of Public Health  
Environmental Division  
2051 Bridgeport Avenue  
Milford, CT 06460  
Telephone: (203) 783-3285  
*Contact: Charles I. Motes, Jr.*

New Haven Department of Health  
Bureau of Environmental Health  
One State Street  
New Haven, CT 06511  
Telephone: (203) 787-8174  
Fax: (203) 772-7234  
*Director: Paul Kowalski*

Department of Health  
137-139 East Avenue  
Norwalk, CT 06851  
Telephone: (203) 854-7776  
*Laboratory Director: Alfred C. Kao*

City of Stamford Department of Health  
888 Washington Boulevard  
P.O. Box 10152  
Stamford, CT 06904-2152  
Telephone: (203) 358-4396  
*Director of Environmental Health: Peter Domdrowski*

Department of Health  
2730 Main Street  
Stratford, CT 06497  
Telephone: (203) 385-4090  
*Public Health Administrator: William J. Watson*

### District of Columbia

Metropolitan Washington Council of Governments  
777 North Capitol Street, N.W.  
Washington, DC 20002-4201  
Telephone: (202) 962-3200  
*Contact: David C. Foerter*

**Florida**

Polk County Department of Environmental Services  
P.O. Box Drawer 39  
Bartow, FL 33830  
Telephone: (813) 533-1205  
Fax: (813) 534-3711  
*Coordinator:* Cecil "Zeb" Palmer

Manatee County Pollution Control  
410 Sixth Avenue, East  
Bradenton, FL 34202  
Telephone: (813) 748-0666  
Fax: (813) 747-7347  
*Director of Pollution Control:* Rob Baum

Pinellas County Department of Environmental Management  
Division of Air Quality  
300 South Garden Avenue  
Clearwater, FL 34616  
Telephone: (813) 462-4422  
Fax: (813) 462-4420  
*Administrator:* Peter A. Hessling

Broward County Environmental Quality Control  
Air Section  
500 S.W. 14th Court  
Fort Lauderdale, FL 33315  
Telephone: (305) 765-4900  
*Chief:* Gary D. Carlson

Air Quality Division  
Towncentre, Suite 412  
421 West Church Street  
Jacksonville, FL 32202  
Telephone: (904) 630-3666  
Fax: (904) 630-3638  
*Deputy Director:* James L. Manning

Reedy Creek Improvement District  
Pollution Control Department  
P.O. Box 10170  
Lake Buena Vista, FL 32830-0170  
Telephone: (407) 824-7311  
Fax: (407) 824-7309  
*Director:* Gary Gornto

Metropolitan Dade County Department  
of Environmental Resources Management  
Air Section  
111 N.W. First Street, Suite 1310  
Miami, FL 33128  
Telephone: (305) 375-3376  
Fax: (305) 375-3360  
*Chief:* H. Patrick Wong

Environmental Services Laboratory  
1301 Cattleman Road, Building B  
Sarasota, FL 34232-6299  
Telephone: (813) 378-6137  
Fax: (813) 378-6139  
*Laboratory Manager/Air Program Manager:* Jose M. Guira

Environmental Protection Commission of Hillsborough  
County  
Air Pollution Control Program  
1410 North 21st Street  
Tampa, FL 33605  
Telephone: (813) 272-5530  
Fax: (813) 272-7144  
*Director:* Iwan Choronenko

Palm Beach County Public Health Unit  
Air Pollution Control Section  
P.O. Box 29, ESE  
West Palm Beach, FL 33402  
Telephone: (407) 355-3070  
Fax: (407) 355-2442  
*Administrator:* James Stormer

**Georgia**

Refer to the state listing in Appendix I

**Guam**

Refer to the territory listing in Appendix I

**Hawaii**

Refer to the state listing in Appendix I

**Idaho**

Refer to the state listing in Appendix I

**Illinois**

Bedford Park Environmental Control Board  
6701 S. Archer Road  
P.O. Box 128  
Bedford Park, IL 60501  
Telephone: (708) 458-2067  
*Chairman:* Scott Mixson

City of Chicago Department of Environment  
City Hall, Room 810  
121 North La Salle Street  
Chicago, IL 60602  
Telephone: (312) 744-4034  
*Assistant Commissioner:* David R. Inman

Public Works Department  
701 Collinsville Avenue  
East St. Louis, IL 62201  
Telephone: (618) 874-2115  
*Commissioner:* Michael Preston

City of Evanston Department of Building and Zoning  
2100 Ridge Avenue  
Evanston, IL 60204  
Telephone: (312) 328-2100  
*Director:* James Wolinski

Bensenville Pollution Control Agency  
1253 Roosevelt Avenue  
Glenview, IL 60025  
Telephone: (708) 390-2610  
*Director:* Richard A. Young

Village of McCook Environmental Commission  
City Hall  
50th and Glencoe Avenue  
McCook, IL 60525  
Telephone: (708) 447-1231  
*Chairperson:* Peter Loquercio

Cook County Department of Environmental Control  
1500 South Maybrook Drive, Room 202  
Maywood, IL 60153-2486  
Telephone: (708) 865-6165  
Fax: (708) 865-6361  
*Director:* Charles F. Lagges

Dupage County Health Department  
Environmental Health  
111 North County Farm Road  
Wheaton, IL 60187  
Telephone: (708) 682-7400  
*Director:* David P. Plueddemann

**Indiana**

Office of Air Management  
P.O. Box 2100  
Anderson, IN 46011  
Telephone: (317) 646-9835  
*Director:* William A. Dorff

Lake County Health Department  
2293 N. Main Street  
Crown Point, IN 46307  
Telephone: (219) 755-3655  
*Administrator:* John Foley

East Chicago Department of Air Quality Control  
3903 Indianapolis Boulevard  
East Chicago, IN 46312  
Telephone: (219) 391-8297  
Fax: (219) 391-3494  
*Director:* Ali Kahn

City of Evansville Environmental Protection Agency  
1 N.W. 7th Street, Room 207  
Civic Center Complex  
Evansville, IN 47708  
Telephone: (812) 426-5597  
*Director:* Christine M. Terry

Gary Air and Land Pollution Control Division  
504 Broadway, Suite 1012  
Gary, IN 46402  
Telephone: (219) 882-3000  
*Director:* George S. Kolettis

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room 304  
Hammond, IN 46320  
Telephone: (219) 853-6306  
*Director:* Ronald L. Novak

Indianapolis Air Pollution Control Division  
2700 S. Belmont Avenue  
Indianapolis, IN 46221-2097  
Telephone: (317) 327-2266  
Fax: (317) 327-2274  
*Administrator:* David R. Jordan

St. Joseph County Health Department  
Division of Pollution Control  
227 Jefferson Boulevard  
South Bend, IN 46601  
Telephone: (219) 284-9721  
*Contact:* Paul Trost

Vigo County Air Pollution Control  
201 Cherry Street  
Terre Haute, IN 47807  
Telephone: (812) 462-3433  
Fax: (812) 235-7558  
*Director:* George M. Needham

**Iowa**

Linn County Health Department  
751 Center Point Road, N.E.  
Cedar Rapids, IA 52402  
Telephone: (319) 398-3551  
*Contact:* H. Keith Erickson

Polk County Public Works  
Air Pollution Control Division  
1530 N.E. 58th Avenue  
Des Moines, IA 50313  
Telephone: (515) 286-3351  
*Engineer:* Jerry Tonneson

**Kansas**

Wyandotte County Health Department  
Air Pollution Control Section  
619 Ann Avenue  
Kansas City, KS 66101  
Telephone: (913) 573-6700  
Fax: (913) 321-7932  
*Director:* Richard S. Michael

Johnson County Environmental Department  
11180 Thompson Avenue  
Lenexa, KS 66219  
Telephone: (913) 492-0402  
Fax: (913) 492-0142  
*Contact:* Mike Booth

Topeka-Shawnee County Health Department  
P.O. Box 118  
Topeka, KS 66601  
Telephone: (913) 233-8961  
*Contact:* Jayati Weerakoon

Wichita-Sedgwick County Department of Community Health  
1900 East 9th Street  
Wichita, KS 67214  
Telephone: (316) 268-8351  
Fax: (316) 268-8340  
*Air Quality Environmentalist:* George K. Huenergardt

**Kentucky**

Air Pollution Control District of Jefferson County  
850 Barret, Suite 205  
Louisville, KY 40204-1088  
Telephone: (502) 625-6000  
Fax: (502) 625-5306  
*Director:* Robert T. Offutt

**Louisiana**

Refer to the state listing in Appendix I

**Maine**

Refer to the state listing in Appendix I

**Maryland**

Anne Arundel Department of Health  
Air Quality Control Section  
3 Harry S. Truman Parkway  
Annapolis, MD 21401  
Telephone: (410) 222-7360  
Fax: (410) 222-7294  
*Chief, Community Hygiene:* Donald Cordts

Baltimore City Health Department  
Bureau of Community and Industrial Hygiene  
303 E. Fayette Street, Room 400  
Baltimore, MD 21202  
Telephone: (301) 396-4428  
Fax: (301) 396-1571  
*Director:* Reuben Dagold

Harford County Health Department  
Air Pollution/Solid Waste Control Division  
P.O. Box 191  
Bel Air, MD 21014-0191  
Telephone: (301) 838-3047  
Fax: (301) 836-5187  
*Supervising Sanitarian:* Larry Webber

Allegany County Health Department  
P.O. Box 1745  
Willowbrook Road  
Cumberland, MD 21502  
Telephone: (301) 777-5653  
Fax: (301) 777-5674  
*Assistant Director of Environmental Health:*  
Conrad B. Zimmerman



Howard County Health Department  
Bureau of Environmental Health  
Technical Services Program  
3525-H Ellicott Mills Drive  
Ellicott City, MD 21043  
Telephone: (410) 461-9955  
*Director: Bertram F. Nixon*

Frederick County Health Department  
Air Quality Control  
12 East Church Street  
Frederick, MD 21701  
Telephone: (301) 694-1717  
Fax: (301) 698-9161  
*Sanitarian IV: Charles L. Gillis, Jr.*

Washington County Health Department  
1302 Pennsylvania Avenue  
Hagerstown, MD 21740  
Telephone: (301) 791-3270  
*Director, Environmental Health: Roderick A. MacRae*

Montgomery County Department of  
Environmental Protection  
101 Monroe Street, 6th Floor  
Rockville, MD 20850-2589  
Telephone: (301) 217-2380  
Fax: (301) 217-6718  
*Air Resources Engineer: Eric S. Mendelsohn*

Prince Georges County Health Department  
Division of Air Quality Control  
10210 Greenbelt Road, Third Floor  
Seabrook, MD 20706  
Telephone: (301) 794-6800, ext. 310  
Fax: (301) 794-6800, ext. 210  
*Division Chief: Melanie Christodoulou*

Baltimore County Bureau of Air Quality  
and Waste Management  
300 East Towsontown Boulevard  
Towson, MD 21204  
Telephone: (410) 887-3775  
Fax: (410) 887-4817  
*Chief: David Filbert*

### Massachusetts

Boston Air Pollution Control  
Boston City Hall, Room 805  
Boston, MA 02201  
Telephone: (617) 635-4417  
Fax: (617) 523-6966  
*Executive Director: D. Brian Glascock*

Fitchburg Board of Health  
City Hall  
718 Main Street  
Fitchburg, MA 01420  
Telephone: (617) 342-9843  
*Director: John E. Coulter, Jr.*

### Michigan

Wayne County Health Department  
Air Pollution Control Division  
640 Temple Street  
Detroit, MI 48201  
Telephone: (313) 832-5000  
Fax: (313) 567-2244  
*Director: Rajendra Sinha*

City of Grand Rapids Environmental Protection  
Air Pollution Office  
1300 Market S.W.  
Grand Rapids, MI 49503  
Telephone: (616) 456-3158  
*Contact: Paul Tatreau*

Macomb County Health Department  
Air Quality Control Section  
43525 Elizabeth  
Mount Clemens, MI 48043  
Telephone: (313) 479-5275  
*Director: Stephen R. Tackitt*

### Minnesota

City of Bloomington Environmental Services Section  
2215 W. Old Shakopee Road  
Bloomington, MN 55431  
Telephone: (612) 881-5811  
*Manager: R.A. Mood*

City of Minneapolis Pollution Control Division  
250 South 4th Street, Room 300  
Minneapolis, MN 55415  
Telephone: (612) 673-5897  
*Contact: Glenn D. Kiecker*

Richfield Health Department  
6700 Portland Avenue  
Richfield, MN 55431  
Telephone: (612) 861-9881  
*Director: I.F. Roesler*

City of St. Louis Park Department of Inspections  
5005 Minnetonka Boulevard  
St. Louis Park, MN 55416  
Telephone: (612) 924-2588  
*Director: Harvey J. McPhee*

### Mississippi

Refer to the state listing in Appendix I

### Missouri

St. Louis County Air Pollution Control  
111 South Meramec  
Clayton, MO 63105  
Telephone: (314) 854-6923  
Fax: (314) 854-6951  
*Program Manager: Blaine J. Rhoades*

City of Independence Public Works/Engineering  
103 North Main Street  
Independence, MO 64050  
Telephone: (816) 836-8300  
*Contact: John W. Bailery*

Kansas City Air Quality  
21st Floor, City Hall  
414 E. 12th Street  
Kansas City, MO 64106  
Telephone: (816) 274-2501  
*Program Manager: Paul F. Stablein*

Mid-America Regional Council  
600 Broadway, Suite 300  
Kansas City, MO 64105  
Telephone: (816) 474-4240  
Fax: (816) 474-4240  
*Air Quality Coordinator: Carol Adams*

Springfield-Greene County Air Pollution Control Authority  
227 East Chestnut Expressway  
Springfield, MO 65802  
Telephone: (417) 864-1662  
*Chief: Ronald Boyer*

Division of Air Pollution Control  
1220 Carr Lane Avenue  
St. Louis, MO 63104  
Telephone: (314) 664-7877  
Fax: (314) 664-7933  
*Commissioner: Arnold E. Montgomery*

### Montana

Yellowstone County Air Pollution Control  
3306 2nd Avenue North  
Billings, MT 59101  
Telephone: (406) 256-6841  
*Director: Steven A. Duganz*

City-County Health Department  
Cascade County Air Pollution Control Program  
1130 17th Avenue South  
Great Falls, MT 59405  
Telephone: (406) 761-1190  
*Director: Bruce L. Treis*

Missoula City-County Health Department  
Air Pollution Control  
301 West Alder Street  
Missoula, MT 59801  
Telephone: (406) 523-4755  
*Director: Jim Carlson*

### Nebraska

Lincoln-Lancaster County Health Department  
Special Services Section  
2200 St. Marys Avenue  
Lincoln, NE 68502  
Telephone: (402) 471-8021  
Fax: (402) 471-8323  
*Manager: Richard Slama*

Air Quality Control Division  
5600 South 10th Street  
Omaha, NE 68107  
Telephone: (402) 444-6015  
Fax: (402) 444-5125  
*Air Quality Control Manager: Chester Black*

### Nevada

Clark County Health District  
Air Pollution Control Division  
P.O. Box 4426  
Las Vegas, NV 89127  
Telephone: (702) 383-1276  
Fax: (702) 383-1443  
*Director: Michael H. Naylor*





Washoe County District Health Department  
Air Quality Management Division  
Box 11130  
Reno, NV 89520  
Telephone: (702) 328-2400  
*Acting Director:* Kevin Golden

### New Hampshire

Refer to the state listing in Appendix I

### New Jersey

Suburban Regional Health Commission  
141 S. Harrison Street, Suite 11W  
East Orange, NJ 07018  
Telephone: (201) 675-1774  
*Deputy Director:* Richard J. Portuese

Elizabeth Department of Health  
60 Winfield Scott Plaza  
Elizabeth, NJ 07201  
Telephone: (201) 820-4068  
*Chief Air Pollution Inspector:* Joseph Faccone

Hudson Regional Health Commission  
215 Harrison Avenue  
Harrison, NJ 07029  
Telephone: (201) 485-7001  
*Executive Director:* Robert Ferraiuolo

Middlesex County Health Department  
Air Pollution Control Program  
County Annex Building  
841 Georges  
North Brunswick, NJ 08902  
Telephone: (908) 745-4350  
*Program Coordinator:* Richard J. Hills

### New Mexico

City of Albuquerque Environmental Health Department  
Air Pollution Control Division  
P.O. Box 1293  
Albuquerque, NM 87103  
Telephone: (505) 768-2600  
Fax: (505) 768-2617  
*Director:* Steven W. Walker

### New York

Albany County Health Department  
Environmental Health Services  
S. Ferry & Green Streets  
Albany, NY 12201  
Telephone: (518) 447-4580  
*Director:* Stephen S. Lukowski

Erie County Department of Environment and Planning  
95 Franklin Street, Room 1077  
Buffalo, NY 14202  
Telephone: (716) 858-6231  
*Director:* Michael Raab

City of New York Department of Environmental Protection  
Bureau of Air Policy and Programs  
59-17 Junction Boulevard  
Elmhurst, NY 11373  
Telephone: (718) 595-4418  
Fax: (718) 595-4477  
*Deputy Commissioner:* Antonia Bryson

Suffolk County Department of Health Services  
Air Pollution Control  
15 Horseblock Place  
Farmingville, NY 11738  
Telephone: (516) 451-4634  
*Chief:* James C. Maloney

Nassau County Department of Health  
Bureau of Air Quality Management  
240 Old Country Road  
Mineola, NY 11501  
Telephone: (516) 535-3232  
*Director:* Bruce B. Smith

Interstate Sanitation Commission  
New York Metropolitan Area  
311 West 43rd Street, Room 201  
New York, NY 10036  
Telephone: (212) 582-0380  
Fax: (212) 581-5719  
*Director:* Alan I Mytelka

Niagara County Health Department  
Main P.O. Box 428  
10th & East Falls Streets  
Niagara Falls, NY 14302-0428  
Telephone: (716) 284-3128  
*Director of Environmental Health: James J. Devald*

Rockland County Department of Health  
Sanatorium Road  
Pomona, NY 10970  
Telephone: (914) 354-0200  
*Assistant Commissioner for Environmental Health:*  
George E. O'Keefe

Onondaga County Department of Health  
P.O. Box 190  
Syracuse, NY 13215-0190  
Telephone: (315) 469-6955  
*Director: R.L. Burdick*

Division of Environmental Health  
Rensselaer County Department of Health  
1600 Seventh Avenue  
Troy, NY 12180  
Telephone: (518) 270-2664  
*Director: Richard Hogan*

Westchester County Department of Health  
Bureau of Environmental Quality  
112 E. Post Road  
White Plains, NY 10601  
Telephone: (914) 285-5010  
Fax: (914) 285-5090  
*Acting Assistant Health Commissioner: Daniel J. Donahue*

#### North Carolina

Western North Carolina Air Pollution Control Agency  
Buncombe County Courthouse  
Asheville, NC 28801-3569  
Telephone: (704) 255-5655  
*Director: Ronald G. Boone*

Mecklenburg County Department of  
Environmental Protection  
700 N. Tyron Street  
Charlotte, NC 28202  
Telephone: (704) 336-5500  
Fax: (704) 336-4391  
*Air Quality Program Manager: Joan Liu*

Cumberland County Health Department  
Environmental Health Division  
227 Fountainhead Lane  
Fayetteville, NC 28306  
Telephone: (919) 483-9046  
*Director: Lacy Williams, Jr.*

Guilford County Department of Public Health  
Environmental Health  
301 N. Eugene Street  
Greensboro, NC 27401  
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*Director: Larry Leach*

Cleveland County Health Department  
Air Pollution Control Center  
315 Grover Street  
Shelby, NC 28150  
Telephone: (704) 484-5130  
*Administrator: Irvin M. Allen*

Forsyth County Environmental Affairs  
537 North Spruce Street  
Winston-Salem, NC 27101  
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#### North Dakota

Refer to the state listing in Appendix I

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177 South Broadway  
Akron, OH 44308  
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Canton City Health Department  
Air Pollution Control Division  
City Hall  
218 Cleveland Avenue S.W.  
Canton, OH 44702  
Telephone: (216) 489-3385  
*Administrator: Bruce E. Blankenship*



Southwestern Ohio Air Pollution Control Agency  
1632 Central Parkway  
Cincinnati, OH 45210  
Telephone: (513) 651-9437  
Fax: (513) 651-9528  
*Acting Director:* Harry St. Clair

City of Cleveland Division of Air Pollution Control  
9127 Miles Avenue  
Cleveland, OH 44105  
Telephone: (216) 441-7400  
Fax: (216) 441-7410  
*Commissioner:* Thomas J. Walsh

Regional Air Pollution Control Agency  
451 W. Third Street, P.O. Box 972  
Dayton, OH 45422  
Telephone: (513) 225-4435  
Fax: (513) 225-3486  
E-Mail: 64:EPK 011  
*Supervisor:* John A. Paul

Lake County General Health District  
P.O. Box 490  
Painesville, OH 44077  
Telephone: (216) 357-2543  
Fax: (216) 357-2548  
*Air Pollution Control Supervisor:* Leon A. Weitzel

Portsmouth Local Air Agency  
Griffin Hall, 740 Second Street  
Portsmouth, OH 45662  
Telephone: (614) 353-5156  
*Director/Engineer:* Donald Walden

North Ohio Valley Air Authority  
814 Adams Street  
Steubenville, OH 43952  
Telephone: (614) 282-3908  
*Director:* Pat J. De Luca

Toledo Division of Pollution Control  
26 Main Street  
Toledo, OH 43605-2032  
Telephone: (419) 693-0350  
Fax: (419) 693-2152  
*Commissioner:* Donald M. Moline

Mahoning-Trumbull Air Pollution Control Agency  
City Hall Annex, Room 107  
9 West Front Street  
Youngstown, OH 44503  
Telephone: (216) 744-1928  
*Director:* Robert R. Ramhoff

## Oklahoma

City-County Health Department of Oklahoma City  
Environmental Program—Air Quality  
921 Northeast 23rd  
Oklahoma City, OK 73105  
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Tulsa City-County Health Department  
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Tulsa, OK 74112  
Telephone: (918) 744-1000  
Fax: (918) 744-6348  
*Program Head:* Ray Bishop

## Oregon

Lane Regional Air Pollution Authority  
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Springfield, OR 97477  
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Fax: (503) 726-3782  
*Director:* Donald R. Arkell

## Pennsylvania

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Philadelphia, PA 19146  
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Fax: (215) 545-8328  
*Assistant Health Commissioner:* Bob Ostrowski

Allegheny County Health Department  
Bureau of Air Pollution Control  
301 39th Street, Building #7  
Pittsburgh, PA 15201-1891  
Telephone: (412) 578-8111  
Fax: (412) 578-8325 (call first)  
*Deputy Director:* Ronald J. Chleboski

## Puerto Rico

Refer to the territory listing in Appendix I

## Rhode Island

Refer to the state listing in Appendix I

**South Carolina**

Charleston County Health Department  
334 Calhoun Street  
Charleston, SC 29401  
Telephone: (803) 724-5800  
*Environmental Health Supervisor: S.W. Dillard*

City of Columbia  
City Hall  
P.O. Box 147  
Columbia, SC 29217  
Telephone: (803) 733-8320  
*Pollution Control Officer: Darlene B. Johnson*

**South Dakota**

Refer to the state listing in Appendix I

**Tennessee**

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Control Bureau  
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Knox County Air Pollution Control  
400 Main Avenue  
City/County Building, Room 459  
Knoxville, TN 37902  
Telephone: (615) 521-2488  
*Director: Terry C. Harris*

Memphis-Shelby County Health Department  
Pollution Control  
814 Jefferson Avenue  
Memphis, TN 38105  
Telephone: (901) 576-7775  
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*Manager: Carter Gray*

Metropolitan Health Department  
Bureau of Environmental Health Services  
Pollution Control Division  
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Nashville, TN 37203  
Telephone: (615) 340-5653  
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**Texas**

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Austin, TX 78767  
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Corpus Christi-Nueces County Health Department  
Environmental Services  
P.O. Box 9727  
Corpus Christi, TX 78469  
Telephone: (512) 851-7200  
*Director: R. Leon Decker*

Department of Health and Human Services  
Environmental Health Division  
Air Pollution Control Section  
320 East Jefferson, Room LL13  
Dallas, TX 75203  
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Fax: (214) 948-4426  
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El Paso City-County Health Unit  
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City of Fort Worth Health Department  
Air Pollution Control  
1800 University Drive, Room 219  
Fort Worth, TX 76107  
Telephone: (817) 871-7280  
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City of Houston Bureau of Air Quality Control  
7411 Park Place Boulevard  
Houston, TX 77087  
Telephone: (713) 640-4200  
Fax: (713) 640-4343  
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Galveston County Health District  
Pollution Control Department  
1205 Oak Street, P.O. Box 939  
La Marque, TX 77568  
Telephone: (409) 938-7221  
Fax: (409) 938-2243  
*Director:* Karen Kilpatrick

Lubbock City Health Department  
P.O. Box 2548  
Lubbock, TX 79408  
Telephone: (806) 762-6411  
*Administrator:* R.D. Goodman

Harris County Pollution Control  
P.O. Box 6031  
Pasadena, TX 77506  
Telephone: (713) 920-2831  
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San Antonio Metropolitan Health District  
Air Pollution Control  
332 W. Commerce  
San Antonio, TX 78285  
Telephone: (512) 299-8780  
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### Utah

Salt Lake City-County Health Department  
Bureau of Air Pollution Control  
610 Sout 200 East  
Salt Lake City, UT 84111  
Telephone: (801) 534-4656  
Fax: (801) 534-4502  
*Director:* James E. Brande

### Vermont

Refer to the state listing in Appendix I

### Virginia

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Office of Environmental Quality  
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Alexandria, VA 22314  
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Arlington County Department of Environmental Services  
2100 Clarendon Boulevard, Suite 801  
Arlington, VA 22201  
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Fax: (703) 358-3606  
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Fairfax County Health Department  
Air Pollution Control Division  
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Fairfax, VA 22030  
Telephone: (703) 246-2541  
Fax: (703) 385-9568  
*Director:* Edgar M. Chase

City of Roanoke  
215 Church Avenue, S.W.  
Roanoke, VA 24011  
Telephone: (703) 981-2731  
*Engineer:* Richard V. Hamilton

### Virgin Islands

Refer to the territory listing in Appendix I

### Washington

Grant County Clean Air Authority  
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Ephrata, WA 98823  
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*Air Pollution Control Officer:* Les Johnson

Northwest Air Pollution Authority  
302 Pine Street, #207  
Mt. Vernon, WA 98273-3852  
Telephone: (206) 428-1617  
Fax: (206) 428-1620  
*Air Pollution Control Officer:* Terry L. Nyman

Olympic Air Pollution Control Authority  
120 E. State Avenue  
Olympia, WA 98501  
Telephone: (206) 352-4882  
*Control Officer:* Charles Peace

Benton-Franklin-Walla Walla Counties Air Pollution  
Control Authority  
650 George Washington Way  
Richland, WA 99352  
Telephone: (509) 946-4489  
*Control Officer/Director:* J. Philip Cooke

Puget Sound Air Pollution Control Agency  
200 West Mercer Street, Room 205  
Seattle, WA 98119-3958  
Telephone: (206) 296-7330  
Fax: (206) 296-7431  
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Spokane County Air Pollution Control Authority  
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Spokane, WA 99201  
Telephone: (509) 456-4727  
*Director:* Eric Skelton

Southwest Air Pollution Control Authority  
1308 N.E. 134th Street, Suite D  
Vancouver, WA 98685-2747  
Telephone: (206) 574-3058  
Fax: (206) 576-0925  
*Acting Executive Director:* Thomas C. Taylor

Yakima County Clean Air Authority  
County Courthouse  
Yakima, WA 98901  
Telephone: (509) 575-4116  
Fax: (509) 575-4071  
*Executive Director:* Thomas T. Silva

#### West Virginia

Refer to the state listing in Appendix I

#### Wisconsin

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Environmental Health  
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Eau Claire, WI 54701  
Telephone: (715) 839-4718  
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Fond Du Lac Inspection Services  
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Fond Du Lac, WI 54935-0150  
Telephone: (414) 929-3275  
*Laboratory Director:* Rod Hisel

Madison Department of Public Health  
Environmental Health and Laboratories  
210 Martin Luther King, Jr. Boulevard, Room 507  
Madison, WI 53710  
Telephone: (608) 266-4821  
*Director:* Jill Schmidt

Milwaukee County Environmental Services  
901 N. 9th Street, 314 Annex  
Milwaukee, WI 53233  
Telephone: (414) 278-4874  
*Director:* Carl W. Birks

#### Wyoming

Refer to the state listing in Appendix I

## Appendix K Fleet Management Bulletin on CFC Recycling Policy



### **fleet management bulletin**

U.S. POSTAL SERVICE  
OFFICE OF FLEET MANAGEMENT

Number: V-17-91 Date: April 26, 1991  
Subject: Chlorofluorocarbon (CFC) Recycling Policy

TO: Field Directors, Operations Support

ATTN: Manager, Vehicle Programs  
Manager, Vehicle Services

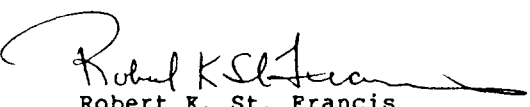
Background - CFC-12, the refrigerant used in most motor vehicle air conditioners, is one of the compounds that contributes to stratospheric ozone depletion and global warming. Many jurisdictions are proposing rules that prohibit the release into the atmosphere or disposal of these refrigerants. These rules apply to the installation, service, or repair of motor vehicle air conditioners or any other related repair or salvage that could cause the release or disposal of refrigerant.

Policy - In order to comply with these proposals, the following requirements must be met effective January 1, 1992:

1. Vehicle Maintenance Facilities (VMFs) performing installation, service, or repair of motor vehicle air conditioners, or any other related repair of air conditioners or salvage of motor vehicles equipped with air conditioners, must obtain and utilize refrigerant recovery and recycling equipment that has a certificate of approval issued by Underwriters Laboratories or any other independent testing organization, which attests that the equipment meets or exceeds the applicable Society of Automotive Engineers (SAE) standards of performance.
2. No employee may install, service, modify, or dispose of any motor vehicle air conditioner or perform related repairs or modifications that may release refrigerants unless that person recovers or recycles all the refrigerant with approved recovery or recycling equipment and employs procedures for the use of the equipment as specified by the manufacturer, and does not dispose of the refrigerants.
3. Employees operating recovery, recycling, or charging equipment must receive a certificate of training from the equipment manufacturer or from an equivalent training program.

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4. The recovery, recycling, or charging equipment must be tested for leaks using an electronic halogen leak detector every six months.
5. Leaks detected in recovery, recycling, or charging equipment must be repaired within two (2) business days after the leak is first detected unless its use is discontinued.
6. No employee may add refrigerant to a vehicle unless the vehicle's system has been tested with a halogen leak detector or a fluorescent tracer dye and ultra-violet lamp, and found to have no leaks.
7. No employee may purchase or use any refrigerants in containers with a capacity of less than twenty (20) pounds.
8. Records of the following information must be maintained for two (2) years:
  - a) Pounds of refrigerants purchased, used, recovered, recycled, and stored per calendar year.
  - b) Semiannual maintenance records for the recovery, recycling, or charging equipment, including the name of the person performing the maintenance, the dates maintenance was performed, results of leak tests, and records of what equipment was checked, modified, serviced, or replaced.
  - c) Annual documentation of the training of all personnel performing or supervising refrigerant recovery, recycling, or charging.
  - d) Annual documentation, by receipt or other verification, for refrigerant that is shipped off-site, if recycling or charging is not done on the premises.

  
Robert K. St. Francis  
Director, Office of Fleet Management  
Operations Systems and Performance Department



## Appendix L

### Management Instruction AS-510-88-14, Underground Storage Tank Management, and Management Instruction AS-510-92-6, New Specifications for Underground Storage Tanks

<h1 style="margin: 0;">Management Instruction</h1>	Date Issued 12 12 88	Filing Number AS-510-88-14
	Effective Date Immediately	Obsoletes N/A
	Originating Organization & OCC Code Facilities Department FD210	
	Title  Underground Storage Tank Management	
Signature & Title  Stanley W. Smith Assistant Postmaster General, Facilities Dept.		

#### I. Policy

The Postal Service must comply with the Hazardous and Solid Waste Amendments of 1984 to the Resources Conservation and Recovery Act (42 USC 6901 et seq.) and other applicable Federal statutes and state and local laws passed in conjunction with these laws. It is the policy of the Postal Service to maintain its entire population of Underground Storage Tanks (USTs) properly and to remedy leaking tank systems promptly and in an appropriate manner.

#### II. Applicability

This Management Instruction (MI) applies to USTs and their associated piping either owned or operated by the Postal Service. An underground tank is one whose volume (including the underground pipes connected to it) is 10 percent or more beneath the surface of the ground. The Postal Service also faces a statutory liability for tanks owned by other parties but operated by the Postal Service at existing leased facilities if the tank causes environmental contamination. The operation of tanks by the Postal Service at existing leased facilities must comply with III-A, III-C, and III-D.

#### III. Responsibilities

##### A. General Compliance - Existing Facilities

1. *Field Division General Manager/Postmaster.* Primary responsibility for compliance with applicable Federal, state, and local laws rests with the Field Division General Manager/Postmaster. A UST coordinator must be named at each Division.

Tank registration, permit requirements (including fees), tank tightness testing, daily inventory control, and product reconciliation are the responsibility of the Field Divisions. The Postal Service must pay reasonable applicable permit fees so long as they are not discriminatory; i.e., if all entities, including state agencies, must pay comparable fees. Also, Field Divisions have responsibility for the development of an inventory of all storage tanks in their jurisdiction including information on the location, type of tank, age, size, integrity, and permit data. The FSC UST coordinator will be responsible for developing the information categories in the inventory. The information will be used in a regionwide data base so that the status of individual tanks or the entire program can be transmitted to Headquarters.

2. *Division Manager of Safety and Health Services.* The Division Manager of Safety and Health Services is responsible for the preparation of an emergency response plan for each facility under its jurisdiction that contains a UST. As a minimum, the plan should include procedures for (a) reporting leaks/spills to the FSC coordinator, (b) protection of Postal employees and facilities in the event of dangers from fire, water contamination, and fumes, and (c) assuring that any remediation efforts are in compliance with EPA, OSHA, and other Federal, state, and local health and safety requirements.

3. *Facilities Service Center (FSC).* The FSC is responsible for developing an annual and long-term UST management pro-

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III-B

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gram and provides technical support for Field Division staff. A UST coordinator must be named at each FSC/FSO. The FSC coordinates funding for tank tightness testing, closure, leak remediation, tank replacement, and repairs. It is the FSC's responsibility to notify state UST regulatory agencies of known tank/piping system leaks. The FSC also is responsible for any necessary risk assessment studies.

#### **B. General Compliance - New Site Acquisition/New Alternate Quarters**

When obtaining alternate quarters or purchasing sites or buildings that have USTs, the Facilities Department is responsible for performing a tank tightness test and arranging for appropriate soil or groundwater testing by an EPA or state approved contractor prior to execution of the sales/lease agreement by the contracting officer. The purpose of the test is to verify that the tank and associated piping systems are tight and that no environmental contamination has occurred. If possible, cleanup of or indemnification for preexisting environmental contamination should be obtained. Leases for alternate quarters should state clearly which party is to have UST maintenance responsibility.

#### **C. Daily Management of USTs**

1. Field Divisions are responsible for inventory control, UST product reconciliation, and leak detection monitoring. Use Fleet Management Bulletin V-14-88 as a reference for specific procedures which require (a) USTs used in conjunction with fleet operations to be checked daily and (b) heating fuel tanks to be checked at least monthly. An automated measurement system may be used in lieu of the manual procedures.

2. Field Divisions must retain the above information and make it available to the appropriate UST coordinator as necessary. When a leak is confirmed, it must be reported immediately to the FSC UST coordinator. The FSC UST coordinator will notify appropriate state regulatory agencies.

#### **D. Long-Term UST Management**

##### *1. Management Action Plan Initiation.*

Each FSC Director is in charge of developing, implementing, maintaining, and carrying out a UST management action plan. This plan must (a) be updated annually and (b) be responsive to both the requirements imposed by Federal, state, and local regulations and the needs of Field Divisions.

2. *Contents of Plan.* The plan must contain, as a minimum, the following elements:

- a. An up-to-date inventory of all USTs within the FSC's geographical area.
- b. A priority listing of UST systems requiring cleanup, replacement, closure, retrofit, and/or repair. Rate tank systems that are known to be leaking in the highest need category. Rate UST systems in noncompliance with Federal/state regulations, but not leaking, in the second highest need category.
- c. A determination of estimated capital and expense costs for the above projects in order to develop annual budget requirements over the next five years.
- d. A determination if the UST systems can or should be retrofitted to meet new Federal/state regulations versus replacement in accordance with Management Instruction AS-510-86-2, *New Underground Storage Tank Systems*. A cost comparison of the alternatives is to be included in the retrofit determination.
- e. A determination by the Division if each of the USTs within their area still is needed for postal operations.
- f. A plan for ongoing tank tightness testing according to all applicable regulations.
- g. A plan to collect data on UST systems where information is currently nonexistent or incomplete. A key item in this regard is the provision of a location map at every UST location.

3. *Other data.* The management action plan should include results of Field Division inventory control/product reconciliation and a risk assessment study for tanks which evaluates factors such as:

- a. Corrosive potential of soil.

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- b. Type of product stored.
- c. Tank system age.
- d. Tank system design and construction.
- e. Availability of monitoring system.
- f. Depth to water table.
- g. Soil permeability.
- h. Population served by aquifer for potable use.
- i. Minimum distance to surface water body.
- j. Minimum distance to underground structures such as sewers and basements.

#### IV. Budget and Fiscal Administration

##### A. Capital vs Expense Projects

1. Tank tightness testing, environmental consultants, tank repair, cleanup, closure, and retrofit must be expensed. The capital tank replacement cost should include site excavation to remove the old tank, purchase of the new tank, and installation of the new tank.
2. Replacement of USTs should be depreciated over a 10-year life per Handbook F-43, *Property Code Numbers*, using PCN 6030.20 for purposes under this program.

##### B. Budget and Financial Plan Development

The Facilities Department will develop fiscal year funding requirements for this program, with placement of operating expense and

capital funds under the Facilities Department control (BA Finance No. 7F 10-0240).

##### C. Program Activity Areas - Project Authorizations

1. Expense and capital budget authorization(s)/allocation(s) will be given to each FSC under the following program activity areas:

- a. Tank Tightness Testing (Expense) (Acct. No. 54221).
- b. Environmental Consultant Support (Expense) (Acct. No. 54222).
- c. Repair, Cleanup, Closure, Retrofit (Expense) (Acct. No. 54223).
- d. Replacement (Capital) (Acct. No. 86125).

2. Individual project authorizations are created for each repair (expense) or replacement (capital) project requiring corrective action. Project-related consultant costs are charged to the specific project in question.

3. Funds allocated to the program are dedicated and are non-reprogrammable to other programs or activities. Periodic fiscal program reviews at USPS Headquarters may result in reprogramming funds between activities on an intra- or inter-service office basis.



# Management Instruction

	<b>Date Issued</b> 3/27/92	<b>Filing Number</b> MI-AS-510-92-6
	<b>Effective Date</b> Immediately	<b>Obsoletes</b> N/A
	<b>Originating Organization &amp; OCC Code</b> Facilities Department FD120	
<b>Title</b> Minimum Requirements for Specifications of Underground Storage Tank Systems	<b>Signature &amp; Title</b> <i>Mitchell H. Gordon</i> Mitchell H. Gordon Senior Assistant Postmaster General	

## I. Purpose

This Instruction provides the minimum requirements for specifications for the new installation of underground storage tanks and associated piping (see Attachment A).

## II. Policy

The specifications described in Attachment A are minimum standards. If federal, state, or local codes are more stringent, they must apply.

## III. Definition

An underground storage tank (UST) is defined as a tank system, including all ancillary equipment (i.e., pipings and containment systems, fittings, flanges, valves, pumps) connected to it, with 10% or more of the tank's volume below ground.

## IV. Scope

The specifications (Attachment A) for new underground storage tank systems apply to all organizational units involved with installation of new underground storage tank systems. This guideline applies to all new underground storage tanks and associated piping containing heating oil, fuel oil, motor oil, used oil, gasoline, diesel fuel or other hazardous materials or waste products. These guidelines are not intended for elevator or hydraulic lifts.

## V. Requirements

### A. General

On September 23, 1988, The Environmental Protection Agency (EPA) issued in 40 CFR Parts 280 and 281 requirements for leak detection and prevention for all underground storage tanks containing regulated substances. These EPA requirements satisfy the mandates of section 9003 of the Resource Conservation and Recovery Act (RCRA). The requirements of EPA 40 CFR Part 280 Subpart B must be met for all new UST systems.

### B. Installation

All new USTs that store petroleum products or other hazardous substances must be registered in accordance with state or local agencies. The state or local agencies must be notified a minimum of 30 days prior to any tank installation.

### C. Record Maintenance

A set of "as-built" drawings showing the complete underground tank system, including piping location, must be maintained at the facility where the system is located.

### Distribution

Standard distribution plus copies each to:  
All affected Headquarters departments and Field activities.

### Special Instructions

Organizations listed under Distribution may order additional copies from material distribution centers. Use Form 7380, *MDC Supply Requisition*, and specify the filing number.

You may redistribute this document by photocopying it, but do not paraphrase or otherwise revise it.

Attachment A

MI-AS-510-92-6

**ATTACHMENT A: MINIMUM REQUIREMENTS FOR SPECIFICATIONS  
OF UNDERGROUND STORAGE TANK SYSTEMS****A. Specifications for Tank Systems**

1. All underground storage tanks must be 360° double walled with interstitial space. Tanks may be:
  - a. Fiberglass reinforced plastic double walled;
  - b. Steel double walled;
  - c. Double walled, steel inner wall with jacketed outer wall; or,
  - d. Steel, double walled tank with steel inner wall and composite (with glass fiber reinforced plastic exterior bonded to steel) outer wall.
2. Tanks must be designed to have a minimum 30-year life.
3. Annular or interstitial space must be monitored by a positive means to detect any breakdown in the inner and/or outer tank walls using one of the following methods:
  - a. A vacuum system;
  - b. Positive displacement (using a liquid such as propylene glycol or brine solution);
  - c. A positive pressure system; or,
  - d. Electronic monitoring of interstitial space (able to detect .1" of H<sub>2</sub>O or .1" fuel or both).
4. Tanks must be designed to prevent releases due to internal or external corrosion or structural failure for the life of the tank.
5. Tanks must be cathodically protected or constructed of non-corrosive materials and designed to prevent the release of stored substances.
6. The material used in constructing or lining tanks must be compatible with the substance to be stored. Substances stored shall include diesel fuel, gasoline, fuel oil, used oil, gasohol containing up to 100% ethanol, or 100% methanol.
7. Tanks must bear the Underwriters Laboratories (UL) label.
8. Prior to installation, the inner tank must be tested at 5 pounds per square inch gauge (psig). While the pressure of the inner tank is maintained, the outer tank must be tested at a minimum of 2 psig. Finally, the tank must be soap tested.
9. The tank must withstand external hydrostatic pressure equivalent to 7 feet of overburden, with the ground completely saturated. The safety factor against buckling must be a minimum of 2 to 1.
10. Tanks must be designed to support accessory equipment such as heating coils, ladders, drop tubes, etc.
11. All tanks must be atmospherically vented in accordance with state/local air pollution codes per National Fire Protection Association (NFPA 31).

**Attachment A: Minimum Requirements For Specifications  
Of Underground Storage Tank Systems**

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Attachment A

12. Anchor straps must be as specified by the tank manufacturer. Location and number of straps must be as specified by the tank manufacturer. Deadman or anchor slab must be provided to prevent tank upheaval.
13. National Pipe Thread (NPT) fittings on the tank must withstand a minimum of 150 foot-pounds of torque and 1,000 foot-pounds of bending with a minimum 2 to 1 safety factor. All fittings must be supplied with threaded plugs. All threaded fittings must be in accordance with American National Standards Institute (ANSI) standards.
14. All fueling piping must be terminated between 4 inches and 6 inches from the bottom of the tank.
15. Lifting lug(s) must be provided on all tanks. These lugs must be capable of withstanding the weight of the tank with a safety factor of 3 to 1.
16. The weight of the tank must be permanently marked on its exterior.
17. Tanks must comply with NFPA 30, "Flammable and Combustible Liquids Code," and NFPA 31, "Standards for Installation of Oil Burning Equipment." Specifications must meet the most stringent requirements of either federal, state, or local codes.
18. Tanks and their piping must be protected against corrosion with the following:
  - a. A properly engineered, installed, and maintained cathodic protection system that meets the latest edition of the following recognized standards of design, as applicable:
    - (1) American Petroleum Institute Publication (API) 1632, "Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems."
    - (2) Underwriters Laboratories of Canada (ULC) CAN4 - C03.1-M85, "Standard for Galvanic Corrosion Protection Systems for Steel Underground Tanks for Flammable and Combustible Liquids."
    - (3) Steel Tank Institute Standard No. STI-P<sub>3</sub>, "Specification for STI-P<sub>3</sub> System of External Corrosion Protection of Underground Steel Storage Tanks."
    - (4) National Association of Corrosion Engineers Standard RP-01-69 Recommended Practice -- "Control of External Corrosion of Underground or Submerged Metallic Piping Systems."
    - (5) National Association of Corrosion Engineers Standard RP-02-85 Recommended Practice -- "Control of External Corrosion on Metallic Buried, Partially Buried, or Submerged Liquid Storage Systems."
    - (6) Underwriters Laboratories Standard 1746, "Corrosion Protection Systems for Underground Storage Tanks."
  - b. Corrosion resistant construction materials must be used, such as special alloys, fiberglass reinforced plastic, fiberglass reinforced plastic coatings, or an equivalent approved system. Selection of the type(s) of corrosion protection to be employed must be based upon:
    - (1) The corrosion history of the area; and,
    - (2) The judgment of a registered (corrosion) engineer.
19. Automatic tank gauging and inventory control system must be installed for all tanks over 2,000 gallons in capacity.

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20. An observation well must be located at each end of the tank. The observation wells must extend two feet below the level of the tanks or the hold-down pad and must be installed in accordance with PEI Recommended practice 100 and API Recommended Practice 1615, and/or state or local codes. Each well must have a lockable cap marked with a black equilateral triangle on a white background and a durable label, warning against accidental or intentional introduction of products into the well.
  21. All electrical equipment and wiring and related installations must be in accordance with applicable state and local codes and/or whichever of the following codes is applicable:
    - a. NFPA 70, "National Electric Code."
    - b. NFPA 30, "Flammable and Combustible Liquids Code."
    - c. NFPA 30A, "Automotive and Marine Service Station Code."
    - d. "Uniform Fire Code," Article 79.
- B. Specification for Types of Tanks**
1. Steel Tanks
    - a. Steel tanks must be cathodically protected by means of a sacrificial anode(s), or impressed current method of corrosion protection; and/or:
      - (1) A protective coating (such as fiberglass or coating in accordance with STI-P3); and,
      - (2) Isolating the tank from underground metallic structures by use of nonconductive bushings or similar methods that isolate the tank. Cathodic protection must include a test station(s) and one voltage meter for testing.
    - b. Steel tanks must conform with UL 58, "Standards for Steel Underground Tanks for Flammable & Combustible Liquids."
    - c. Steel tanks must be designed to prevent internal and external corrosion. Tanks must have unwelded plate overlaps, seal welded. Steel wear plates with a minimum size of 8" x 8" x .25" steel must be provided under all openings in the primary tank.
  2. Glass Fiber Reinforced Plastic Underground Storage Tanks
    - a. Tanks must be constructed in compliance with the latest edition of one of the following standards:
      - (1) American Society for Testing & Materials (ASTM) Specification D4021-86, "Standard Specification Glass Fiber Reinforced Polyester Underground Petroleum Storage Tanks."
      - (2) UL 1316, "Standard for Glass Fiber Reinforced Plastic Underground Storage Tanks for Petroleum Products."
      - (3) Underwriter's Laboratories of Canada CAN4-5615-M83 "Standard for Reinforced Plastic Underground Tanks for Petroleum Products."
    - b. Tanks must be provided with striker plates under all tank openings.
  3. Steel/Fiberglass-Reinforced-Plastic Composite Tanks
    - a. Tanks must be constructed in compliance with the latest edition of the following standards:

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- (1) Underwriter's Laboratories Standard 1746, "Corrosion Protection Systems for Underground Storage Tanks."
- (2) Association for Composite Tanks ACT-100, "Specification for the Fabrication of FRP Clad Underground Storage Tanks."

**C. Specifications for Distribution Piping, Valves, and Fittings**

1. Piping, valves, fittings, and related components must be designed and fabricated from suitable materials that have adequate strength and durability to withstand operating pressure, structural stress, and exposure.
2. Piping must be installed in accordance with acceptable practices to avoid damage during installation, testing, or operation. Material must be compatible with the products stored (diesel fuel, fuel oil, motor oil, gasoline, gasohol 100% ethanol, and gasohol 100% methanol), and must be installed according to the manufacturer's recommendation.
3. Piping materials must be as follows:
  - a. Metallic piping must be minimum Schedule 40 galvanized or wrapped black wrought iron pipe with minimum 150# malleable iron fittings and 250# unions underground. Buried metallic piping systems must be independently protected from corrosion by a properly engineered and installed cathodic protection system with monitor station, designed for a 30-year minimum life.
  - b. Fiberglass-reinforced plastic piping must be installed according to the manufacturer's instructions. Piping materials and epoxies must be compatible with the products stored. Piping must be UL listed. Pipe must have minimum 30-year life.
4. Distribution piping must be provided with a secondary containment system independent of the underground tank. Secondary containment must be a double wall piping system installed per the manufacturer's recommendations.
  - a. The secondary pipe system must:
    - (1) Be tested at minimum 5 psig.
    - (2) Be cathodically protected if metallic piping is used.
    - (3) Have a monitoring system to detect leaks independent of tank monitoring.
5. Spill and overfill prevention equipment
  - a. Provide spill prevention equipment that prevents release of the product if the transfer hose is detached from the fill pipe; provide containment manholes around fill pipes and large enough to contain a volume equal to delivery hose volume (minimum capacity 20 gallons). Provide containment manhole with bypass valve to allow captured product to drain back to tank.
  - b. Provide overfill prevention equipment that will automatically shutoff flow into the tank when the tank is no more than 95% full; or alert the transfer operator when the tank is no more than 90% full by restricting the flow into the tank (maximum flow of 3.5 gpm) or triggering a high-level alarm. For used oil tanks, provide a high-level alarm that notifies the facility manager when the tank is 90% full.
6. Provide stage 1 and stage 2 vapor recovery on all vehicle fueling tanks.
  - a. Label stage 1 vapor recovery connection as follows: "Warning: Do not use as fill connection designed for STAGE 1 vapor recovery."

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- b. Provide minimum 1.5" diameter pipe from tank extended to dispenser island and brought vertically to grade adjacent to dispenser. Note: In areas where stage 2 vapor recovery is not required cap pipe and label as follows: Provided for future STAGE 2 vapor recovery."
7. Provide emergency shut-off (impact) valve at the top of the fuel island and breakaway couplings at the fuel dispensing hoses for vehicle fuel dispensers.
- D. Installation**
  1. Tank and piping systems must be installed according to manufacturer's recommendations, NFPA 30A, and NFPA 31.
  2. Excavation and trenching must comply with OSHA construction standard 1926.650, "Excavation, Trenching and Shoring."
  3. Installation of underground systems must comply with the latest editions of API Publication 1615, "Installation of Underground Storage Systems" or PEI Publication RP100, "Recommended Practices for Installation of Underground Storage Systems."
  4. Tanks must be installed with minimum of 18 inches of compacted backfill and 8 inches of reinforced concrete cover in traffic areas where the ground is dry. In non-traffic areas the cover thickness may be reduced to 12 inches of compacted backfill and 6 inches of reinforced concrete. In high-groundwater sites, the required cover must be designed by a registered engineer to counteract the bouyancy of the tank.
  5. Before the tank is placed in a hole, it must be tested with 5 psig on inner tank (minimum one hour) after verifying integrity of the inner tank. Maintain the inner tank pressure and test outer tank with a minimum of 2 psig pressure while soaping the skin of the tank. Do not approach end caps or manways while tanks are being tested. An air gauge with quarter pound increments must be used. (Fill outer tank with air from inner tank; do not fill interstitial space directly).
  6. Piping must be installed at a minimum of 18 inches below grade and sloped at a minimum 1/8-inch per foot down to the tank.
  7. Primary piping must be tested (except for fill piping) at 150% of maximum operating pressure, or 50 psig air pressure, whichever is greater for a period of one hour while all joints are soaped. If lines have held product or after backfilling, test all lines hydrostatically at 110% of maximum operating pressure, but not less than 50 psig.

WARNING: Piping must be isolated from tanks and dispensers before testing.

8. At least three days before performing any of the following, the contractor must submit to the Contracting Officer for his approval a schedule indicating when the following installation procedures can be observed.
  - a. Lifting and placing of the tank into the hole. (The tank must not be rolled or dropped into the hole).
  - b. Field Pressure testing of the tank and 40,000-volt Holiday test for steel tanks clad with FRP cladding.
  - c. Verification that the UL label is located on each tank.
  - d. Anchoring of the tank according to manufacturer's recommendation.
  - e. Compacting of backfill (maximum of 12 inches lift). The need for filter fabric is to be determined by a geotechnical engineer registered in the state where the tank is located. Normally, filter fabric

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lining of the excavation will be required at sites with unstable soils or sites with finegrained (silty) soils and high groundwater fluctuation.

- f. Pressure testing of piping.
  - g. After the installation of the tank into the ground (after the tank and piping have been backfilled), perform a precision-tightness test of both tanks and piping by an independent testing lab in accordance with NFPA 329 before placing the tank in service.
9. Certification of installation must be provided demonstrating that the tank system has been properly installed as follows:
- a. The installer has been certified by the tank and piping manufacturer;
  - b. The installer has been certified or licensed by the (state or local) implementing agency as applicable;
  - c. The installation has been inspected and certified by a registered professional engineer with education and experience in UST installation;
  - d. The installation has been inspected and approved by the (state or local) implementing agency as applicable; and,
  - e. The tank system installer has signed a certification indicating that the tanks have been installed in accordance with the manufacturer's checklist.

#### E. Submittals

The contractor must provide the following:

1. Complete submittals, including product data; installation, maintenance, operating, and testing instructions for underground tank storage systems; and certification of installation described in Paragraph D.9; equipment warranties and guarantees; new test results; site assessments; permits; operational instructions for all equipment; and notices of violation.
2. A copy of all local and state regulations for underground storage tanks.
3. Complete shop drawings showing the exact location of all tanks and piping and related systems.

NOTE: Consideration should be given to locating motor oil, used oil, and fuel oil tanks smaller than 660 gallons above ground or in basements, since single-wall tanks could be used. The design should conform with NFPA 30, 30A, and 31. Aboveground tanks should be provided with overfill protection and 110% spill containment capacity. To meet requirements of the Clean Water Act aboveground tanks larger than 660 gallons must have a berm, pit, or dike to contain a possible spill.

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## Appendix M

### Management Instruction EL-810-91-6, Asbestos-Containing Building Materials Control Program



# Management Instruction

#### Title

Asbestos-Containing Building Materials Control Program

<b>Date Issued</b> 11/6/91	<b>Filing Number</b> EL-810-91-6
<b>Effective Date</b> Immediately	<b>Obsoletes</b> MI EL-810-85-5 (11-6-85)
<b>Originating Organization &amp; OCC Code</b> Employee Relations Department ER240	
<b>Signature &amp; Title</b>  Joel S. Trosch Assistant Postmaster General, ERD	

#### I. Purpose

This instruction provides revised policy guidance for the identification and control of asbestos-containing building materials (ACBMs). The revision is necessitated by changes in federal environmental and occupational health regulations and guidance and in the *Administrative Support Manual*. Program responsibilities at all levels of the organization and the field divisions responsibility for managing ACBMs in place are clarified. The instruction decentralizes record keeping, except for data collected by the Facilities Department regarding abatement activities.

Note: EPA guidance and federal and state regulations change frequently. This instruction sets out the broad outline of locally implemented asbestos control programs and responsibilities, but asbestos program coordinators must keep current with the latest information and incorporate it into the program.

#### II. References

##### A. Environmental Protection Agency Guidance Documents

The programs established by this instruction are largely predicated on guidance developed by the Environmental Protection Agency (EPA). In implementing this instruction, field divisions, regions, and Headquarters field units (HFUs) must use the latest EPA guidance. At this printing those documents are 20T-2003, *Managing Asbestos in Place*, and 560/5-85-024, *Guidance for Controlling Friable Asbestos-Containing Materials in Buildings*.

#### B. Regulations

1. **EPA Regulations.** The following EPA regulations are applicable:

a. The National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 61, Subpart M) regulates asbestos emissions from demolition, renovation, and other abatement-related activities. New categories of friable and nonfriable ACBMs are defined under this regulation.

b. Asbestos-Containing Materials in Schools (promulgated under the Asbestos Hazard Emergency Response Act) (40 CFR Part 763) also provides regulations and guidance materials. Bulk samples must be analyzed according to AHERA, Appendix A, Subpart F to comply with the asbestos NESHAP.

c. The Asbestos School Hazard Abatement Reauthorization Act (ASHARA) establishes accreditation requirements for inspectors and abatement contractors working in public and commercial (e.g. postal) buildings. Specific regulations on these requirements will be issued no later than November 1992 under the provisions of the Act.

2. **OSHA Regulations.** The following Occupational Safety and Health Administration (OSHA) regulations are applicable:

a. The OSHA Asbestos Standard (29 CFR 1910.1001) defines employee permissible exposure limits (PELs) and controls for general industry occupational exposure to all forms of asbestos. When necessary, employee exposure air monitoring must follow this regulation.

#### Distribution

Standard Distribution plus copies to:  
MOCs; MOTSCs; PEDCs; MSC Dirs.;  
Field Div. Mgrs., Support Services

#### Special Instructions

Organizations listed under Distribution may order additional copies from area supply centers. Use Form 7380, *MDC Supply Requisition*, and specify the filing number.

You may redistribute this document by photocopying it, but do not paraphrase or otherwise revise it.

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b. The OSHA Construction Standard for Asbestos (29 CFR 1926.58) defines employee PELs and work practices for removal or encapsulation of ACBMs; activities involving construction, alteration, repair, maintenance, or renovation where ACBMs are present; and demolition of structures where ACBMs are present. The nonmandatory guidelines on asbestos control in Appendices to 1926.58 must be followed in postal facilities.

3. *State and Local Laws and Regulations.* State and local environmental laws also govern the presence, abatement, and disposal of asbestos. Applicable portions of these laws and regulations must be followed. (See ASM 550).

#### C. Availability

Copies of EPA documents are available from EPA regional offices or the EPA Headquarters TSCA Assistance Office, (202) 554-1404. Copies of OSHA documents are available from local OSHA offices or the OSHA Headquarters Publications Office, (202) 523-9667. Documents are also available from the National Technical Information Service, (703) 487-4650.

### III. Asbestos Control Policy and Program Elements

#### A. General Policy

The U.S. Postal Service will provide a safe and healthful work environment for all employees and building occupants. Such an environment requires that adequate precautions be taken to prevent employee exposure to airborne asbestos fibers. Effective control of ACBMs not only protects occupants, but also reduces the risk of costs associated with asbestos fiber release episodes, e.g. disruption to operations, employee medical surveillance, and injury compensation. Field division general manager/postmasters (GM/PMs) must ensure that this policy is implemented within their functional areas. Field division asbestos control programs consist of elements detailed in III-B.

#### B. Field Division Program Elements

1. *Inspection.* All postal-owned and -leased buildings must be inspected by AHERA/ASHARA accredited inspectors to identify, and assess the condition of, all ACBMs present. Inspection records must be kept at the facility and field division level.

2. *ACBMs Management.* Facility-specific operations and maintenance (O&M) programs must be established, in accordance with EPA Publication 20T-2003, to ensure that:

a. ACBMs remain undisturbed and in good condition to prevent fiber release.

b. ACBMs are monitored frequently.

c. Damaged materials are promptly repaired and previously released fibers are cleaned up. (See III-B-5.)

3. *Abatement.* Sprayed-on fireproofing and sound-insulating materials that contain asbestos must be removed due to the high potential for release of asbestos fibers from these materials. (Sprayed-on materials that were encapsulated prior to issuance of this instruction may be managed in place if in good condition.) The need to remove or otherwise control other ACBMs, e.g. pipe lagging, must be determined using fiber release assessments as described in EPA Publication 560/5-85-024.

4. *New Space.* No lease agreements, lease renewals, or building purchases may be initiated for space known to contain sprayed-on surfacing or thermal materials, or other ACBMs in poor condition and capable of releasing asbestos fibers. NESHAPS Category I and II nonfriable asbestos-containing materials, such as resilient floor coverings and asphalt roofing, are permissible.

5. *Work Practices.* Postal employees do not work with ACBMs if the activity may reasonably be expected to release asbestos fibers. Routine cleaning and maintenance of nonfriable materials, e.g. vinyl asbestos floor tiles, is permissible. All maintenance, repairs and cleanups, alterations, renovations, or removals that may release or reentrain asbestos fibers must be accomplished by qualified asbestos contractors. The exception is for accredited inspectors who conduct bulk sampling of suspect ACBMs.

### IV. Program Responsibilities

#### A. Headquarters

1. *The Employee Relations Department.* The Employee Relations Department develops policy on ACBMs in buildings in order to protect employees and building occupants and coordinates with other government agencies to ensure that policies meet all regulations and guidelines. The Office of Safety and Health (OSH), through the Human Resources Service

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Centers (HRSCs), monitors field division programs as necessary. OSH also provides technical assistance through interpretation of EPA and OSHA regulations and guidelines and disseminates the latest information regarding changes in regulations and guidelines.

**2. The Facilities Department and Facilities Service Centers.** The Facilities Department and its field counterparts (e.g. asbestos program coordinators at the Facilities Service Centers (FSCs)) manage abatement, maintenance (which may release or reentrain fibers), and repair of ACBMs in postal buildings through contracted asbestos experts. The Facilities Department also ensures that prelease and purchase inspections are conducted for the presence of ACBMs and that ACBMs are not installed in new facilities. The Facilities Department maintains the Hazardous Materials Subsystem (HMS) of the Facility Management System (FMS), which is used to manage ACBMs abatement data.

**3. The Engineering and Technical Support Department.** The Engineering and Technical Support Department, through its field counterparts, establishes policies regarding maintenance-related activities, with the support of proper training, to ensure that identified ACBMs are not disturbed.

**4. The Training and Development Department.** The Training and Development Department offers training for divisional asbestos program coordinators at the William F. Bolger Management Academy. PEDCs ensure that accredited inspector training is properly maintained by coordinating accreditation training and certification, as well as refresher training, with the state. Awareness training for employees is administered through PEDCs.

#### **B. Regions**

The regional director of human resources evaluates field division asbestos control programs and reports to the Regional Postmaster General. The Human Resources Service Center safety and health staff at the regional office assists. Periodic reviews, performed by regional and field division personnel, are made to evaluate the adequacy of division asbestos control programs.

#### **C. Field Divisions and Headquarters Field Units**

Field division PM/GMs and HFU managers are responsible for establishing an asbestos control program for the functional area of responsibility. They must designate an asbestos program coordinator. The program coordinator assigns responsibilities and institutes procedures to inspect all facilities for the presence of ACBMs and establish O&M programs in those facilities found to contain ACBMs.

#### **D. Assigned Organizations**

Specific organizations and individuals in each building with ACBMs must be assigned responsibility for the O&M program for that building. When sprayed-on or damaged ACBMs are found, the FSC is alerted by the division to accomplish repair or abatement. The asbestos program coordinator must ensure that facility-specific records of inspections, O&M programs, and abatement activities are maintained in a central location at the division. All ACBMs control efforts at the division level must be a concerted effort of support services, human resources, and operations support.

### **V. Training**

#### **A. Coordinators**

Division asbestos program coordinators must be trained in asbestos control by the Management Academy. They must also have AHERA accreditation as inspectors and/or management planners. They must be familiar with all aspects of asbestos control, including O&M program development and ACBMs evaluation. They must also receive additional refresher training using private sector and/or EPA approved AHERA/ASHARA courses.

#### **B. Inspectors**

Division personnel assigned to inspect and assess the condition of ACBMs must have AHERA/ASHARA accreditation as inspectors. This accreditation is accomplished by taking an AHERA Inspector or Inspector/Management Planner Course, passing an exam, and taking refresher courses. Either EPA-approved courses or EPA-approved state accreditation programs and training courses may be used. (States have developed programs and courses that, if they meet or exceed requirements of the Model Accreditation plan, are EPA approved.) A list of approved courses is published in the Federal Register periodically and can be obtained by calling the Toxic Substances Control Act (TSCA) Assistance Office (202) 554-1404. Applicable provisions of

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OSHA standards must also be met, including respiratory protection and hazard communication training. Training records must be kept current through the PEDC.

#### C. Maintenance Personnel

Maintenance personnel who routinely perform tasks in buildings that could disturb ACBMs (i.e. pulling cable above suspended ceilings, repairing leaking pipes, etc.) must receive an appropriate level of asbestos awareness training and OSHA training that includes topics such as where ACBMs are located in the building, potential adverse health effects of asbestos, the proper use of personal protective equipment, proper cleaning techniques, and other site-specific topics, as deemed necessary. (Consult the EPA publication 20T-2003.)

#### D. Other Building Occupants

Other employees and tenants must receive a level of ACBMs-awareness training appropriate to their risk of exposure. Not everyone needs the same degree of information. Most employees and other occupants need to know only the location of ACBMs and that they are safe if left undisturbed. The risks of disturbing the material and releasing fibers should be explained. Some persons may need site-specific training to avoid disturbing the ACBMs.

### VI. Abatement Projects

#### A. Supervision

The Facilities Department has the responsibility for maintenance, repair, removal, renovation, and demolition projects involving ACBMs. The Facilities Department may, at its option, delegate certain abatement responsibilities to divisional support services. All such efforts, as they impact the safety of employees and building occupants, must be carefully coordinated with field division human resources as well as operational functions. The field division GM/PM retains ultimate responsibility for the safety and health of employees and building occupants. Before implementing asbestos abatement projects, the field division GM/PM notifies all affected building occupants.

#### B. Conduct of Abatement Projects

Projects must comply with the asbestos NESHAP regulations (for reporting and emission controls), the OSHA standards, and guidance contained in EPA Publication 560/5-85-024. Clearance air sampling for small-scale, short-duration projects may be analyzed by phase contrast microscope or

transmission electron microscope (TEM) using the methods and clearance levels described in the document. Larger scale projects must be cleared by TEM using the procedures outlined in the guidance. An alternative method for clearance air monitoring is described in 40 CFR 763 (AHERA), and it can be substituted for the TEM method in EPA Publication 560/5-85-024. An independent industrial hygiene consultant firm must monitor all abatement projects. All abatement planners, project managers, contractor supervisors, on-site representatives required by the asbestos NESHAP, and abatement workers must have AHERA accreditation training.

#### C. Renovation Projects

Before renovation projects are begun, regardless of size, asbestos program records must be reviewed and the facility or affected area must be reinspected for the presence of ACBMs. If it is determined that regulated asbestos-containing materials (RACMs), as defined in the asbestos NESHAP, are present, all reporting and emission control provisions of 40 CFR Part 61 must be followed.

### VII. Record Keeping

#### A. Obsolete Forms

All report and inspection forms generated under the previous management instruction are obsolete. However, the data contained on the old formats in the FMS must be obtained from the FSC and used to supplement new information specific to the division's asbestos control program. Additionally, the Facilities Department may continue to use some of the data collected under the old system to track and manage ongoing and planned abatement projects.

#### B. Local Records

Division asbestos program coordinators must, at a minimum, collect the information specified on the initial inspection and evaluation sample forms contained in the two EPA references. The building inspection form is on page I-1 of EPA-560/5-85-024. The reinspection and assessment form is on page 31 of 20T-2003. Coordinators may also use the other sample forms from the EPA documents for controlling maintenance-related activities.

#### C. Data Management

Inspection and reinspection/assessment data required to manage a facility level O&M program should be retained in that facility as determined by the division asbestos program coordinator. Additionally, the asbestos pro-

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gram coordinator should compile the written programs and data on all buildings in the division with ACBMs in order to assess O&M programs, assure reinspections are scheduled, and provide information, when requested, to the region and headquarters on the division's program. The office responsible for an abatement project (e.g. FSC, support services) maintains the abatement case file, although information on all abatement activities should also be retained by the asbestos program coordinator. Training records are retained by the PEDC.

#### D. Retention

All asbestos program files must be retained at the division level for 30 years. Abatement case files must also be retained 30 years. Note that asbestos exposure data specific to postal employees, e.g. air monitoring conducted in accordance with the OSHA asbestos standard, must be retained in accordance with the standard (see 29 CFR 1910.1001) in the safety office and in employee medical folders as appropriate.

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**Division ACBMs Program Implementation Checklist**

- ☐ 1. Division asbestos program coordinator appointed.
- ☐ 2. Asbestos program written and coordinated with human resources, operations support, and support services.
- ☐ 3. Program oversight and monitoring included.
- ☐ 4. Initial inspection of all division buildings for ACBMs planned and executed.
- ☐ 5. FSC notified when ACBMs abatement required.
- ☐ 6. O&M programs established specific to each building with ACBMs. (See EPA 20T-2003 for details.)
  - ☐ A. Occupants notified of presence and location of ACBMs and risks of releasing fibers.
  - ☐ B. ACBMs routinely surveyed (e.g., every 6 months) for changes in condition.
  - ☐ C. Controls established to prevent disturbance of ACBMs.
  - ☐ D. Custodial and maintenance work practices established to prevent ACBMs fiber release.
  - ☐ E. Custodians and maintenance workers trained to avoid disturbing ACBMs.
  - ☐ F. Emergency fiber release plan established.
  - ☐ G. Inspections conducted prior to renovations to ensure compliance with asbestos NESHAP.
- ☐ 7. Training accomplished.
  - ☐ A. Asbestos program coordinator trained in USPS program and AHERA accredited as inspector/management planner.
  - ☐ B. Inspectors AHERA/ASHARA accredited and trained on respiratory protection per the OSHA standard.
- ☐ 8. Records managed.
  - ☐ A. Old printouts obtained from FSC.
  - ☐ B. EPA forms adapted for divisional use.
  - ☐ C. Inspection copies retained at facility level.
  - ☐ D. Inspection reports and other program data compiled and managed at the division.
  - ☐ E. Abatement project files retained by responsible office (support services, FSC).
  - ☐ F. Plan implemented to ensure centralized retention of records.

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## Appendix N

### The Southern California Experience

#### Introduction

The South Coast Air Quality Management District (SCAQMD) covers the geographical area of five postal field divisions. It is the first major case where the Postal Service has received a Notice of Violation (see Chapter 5) for noncompliance with provisions of the Clean Air Act or its amendments. As a result, the five divisions, in conjunction with a unique Western Region environmental unit, developed appropriate first-year compliance plans.

#### Truck Fleets

The SCAQMD compliance plan has an appendix that provides the district with information on truck fleet operations. There is the potential for regulation of fleet activity. The City of Los Angeles is pursuing the partial prohibition of heavy truck operations on city streets during commuter hours. The 1993 California Clean Air Act revision may require "cleaner burning" vehicles, which may affect Postal Service fleets.

#### Trip Reduction Plans

The Los Angeles area has extreme air pollution problems, primarily ozone (0.33 ppm) formed from mobile emissions sources. As a result, SCAQMD has attempted to reduce the number of vehicle trips taken, especially during the morning rush hour. SCAQMD Regulation XV requires organizations that employ 100 or more people at any single worksite to develop a plan (for each site) that encourages employees to reduce the number of vehicle trips taken between home and work. These plans are intended to reduce pollutant/exhaust emissions by reducing the number of commuter vehicle trips (such as increasing the number of riders per vehicle) from 6:00 to 10:00 a.m., Monday through Friday. This time period is critical for SCAQMD's daily smog development. The program has been marketed to the public as "traffic congestion relief." Other ozone nonattainment areas in the United States may follow with similar strategies.

The southern California experience offers the following insights on trip reduction plans:

- a. Contract rules and operational requirements limit the Postal Service's ability to assign employees to other worksites to facilitate carpooling.
- b. The tour bidding process may have to incorporate a new factor—where one lives and one's ability to carpool or use alternative transportation to the automobile.
- c. The rescheduling of arrival times prior to 6:00 a.m. will require the Postal Service to pay the night differential.
- d. Staggered/sequenced intratour start times may be a barrier to carpooling.
- e. The allocation of work time may require all employees at each affected site to complete a two- to three-page survey of their commuter practices and attitudes.
- f. A City of Los Angeles ordinance requires up to a \$15-per-month-per-employee subsidy for mass transit commuters.
- g. Known quantifiable costs are listed in Exhibit N.1.

Item	Cost
Transit subsidies per employee	\$15 per month
Procurement of smog monitor radios	\$450 per facility
Training of transportation coordinator (one for each facility with more than 100 employees)	\$375 for initial training (20 hours) \$120 for annual renewal training (8 hours)
Plan filing fee (annual)	
– 100–199 employees	\$375 per site
– 200–499 employees	\$575 per site
– 500 or more employees	\$775 per site
Number of regulated locations by division	
Santa Ana	31
Los Angeles	16
Van Nuys	22
Long Beach	26
San Diego	10

**Exhibit N.1, Costs Associated with SCAQMD Regulation XV Compliance**

- h.* The Postal Service has to establish sufficient budgets for Regulation XV-stimulated activities. SCAQMD has a \$100,000 annual rideshare budget for its 750 employees. Typical program costs have ranged from \$6 to \$55 per employee per month.
- i.* There is a need to police the use and receipt of incentives.
- j.* There is a need to monitor the trip reduction plan (annual submittal to SCAQMD).
- k.* There may be a need for plan revisions when there is much employee turnover.
- l.* Site selection criteria should be modified to reflect Regulation XV—reduction in parking capacity, proximity to mass transit services, and improved customer access by alternative transportation.
- m.* The provision of free parking encourages car use. A pay-for-parking disincentive might be considered, as well as the encouragement of carpooling and clean fuel cars. This is, however, a collective bargaining issue.
- n.* There may be a decrease in the number of parking spaces to be constructed and maintained at Postal Service facilities. This may free up space for building expansions into former parking areas.
- o.* The loss of individual commuter vehicles may reduce the available employee pool for unanticipated overtime. A guaranteed ride program has been established to relieve the problems of involuntary overtime and emergency leave for carpool/vanpool members or drivers.
- p.* The reduction of post office employee vehicles on streets will increase customers' accessibility to Postal Service locations, reduce Postal Service vehicle travel time, decrease commuter-related stress, and improve community relations.

#### Sample Trip Reduction Plan

A trip reduction plan for a commuter program, which was established in 1988 by SCAQMD, is included as an attachment to this appendix.

**Attachment**  
**Sample Trip Reduction Plan**





**United States  
Postal Service**

January 22, 1992

James M. Lents, Ph.D.  
Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4182


Dear Mr. Lents:

I have read and understand Regulation XV and Culver City Post Office's Transportation Management Plan. I feel very strongly that this plan will meet all the requirements set forth and mandated in Regulation XV. I wholeheartedly approve of this program and I am totally committed to its success.

I hereby certify that the enclosed plan has been prepared by a trained Transportation Coordinator, and that all information included there-in is accurate, complete or a verifiable estimate.

If you require any further information please contact me or Catherine Brewster, Employee Transportation Coordinator at (310) 391-6374.

Sincerely,

  
David Quella  
Postmaster  
Culver city, CA 90230-9998

cc: PM  
ETC

Enclosure



**Part One: Forms**

**Filing Fee Form**

Use this form to determine your Trip Reduction Plan filing fees required under Rule 308. Failure to submit a Trip Reduction Plan with the required fee is a violation of the California Health and Safety Code (Article 3, Chapter 4, Part 4 of Division 26) and may subject the employer to penalties (as outlined on the official notification letter).

United States Postal Service - Culver City, Ca 90230-9998  
Company Name

In Column 1 (Site Identification #) indicate ID number of each work site for which you are filing plans (6-digit number which appears on the top left hand side of the official notification letter and must be referenced by employers on all communications with the District). In Column 2 (Site Address) indicate street address and city of site to correspond with Column 1 and 2. In Column 3 (Total # of Employees) indicate total number of employees at each worksite to correspond with Columns 1 and 2.

Fees are based on the total number of employees at each site (all shifts). Using the fee structure below calculate the amount due according to the number of employees per site and enter in Column 4. Employers with multiple sites may use additional pages if necessary.

500 +                Employees = \$775  
200 to 499        Employees = \$575  
100 to 199        Employees = \$375

Indicate the total amount of fees submitted under Column 4.

If you have any questions regarding this form please call the Transportation Programs Division at (213) 253- 1255.

COLUMN 1 Site ID #	COLUMN 2 Site Address/City	COLUMN 3 #of Employees	COLUMN 4 Amount Due
078674	11111 Jefferson Blvd.		
	Culver City, Ca. 90230-9998	95	\$375.00
Total Fees:			\$ 375.00

Checks should be made payable to **South Coast Air Quality Management District**. Please mail this form with the check and the completed Trip Reduction Plan. *Do not* send the check separately.

## Introduction: Employer Profile

Section I must be completed by employers filing both new and annual update plans (see instructions on pages 28-29)

**A. Name and Address of Organization (site address)**

U.S. Postal Service Culver City, Ca. 90230-9998

Name

11111 Jefferson Blvd. Culver City, Ca. 90230-9998 L.A.

Number, Street and Suite

City

Zip

County

**B. Mailing Address (If different from organization address):**

Same

Number, Street and Suite

City

Zip

County

**C. Identification Number (refer to notification letter)**

078674

**D. Total Number of Employees at All Sites in the South Coast Air Basin. (Los Angeles, Orange, Riverside, and non-desert portion of San Bernardino county)****E. Site Code**

B

S = Single site

B = Branch of larger organization

H = Headquarters with branches in South Coast Air Basin

List all other sites on Form I-2 (with 25 or more employees) in Los Angeles, Orange, Riverside, and non-desert portion of San Bernardino county.

**F. Source Receptor Area Number (Refer to Source Receptor Map included in instruction packet)**

2

**G. SIC Code - Standard Industrial Classification Code**

4300

**H. Type of Business (explain in detail)**

U.S. Postal Service - Associate Office

Collection and Delivery of U.S. Mail

Retail Window Sales Unit

**I. Site Transportation Coordinator(s)**

Name Catherine Brewster Title Bulk Mail Technician

Department Culver City, Ca. 90230-9998 Phone (310) 391-6374

Estimated total number of hours spent preparing Trip Reduction Plan 95 Hrs.

Estimated total number of hours spent (weekly) implementing Trip Reduction Plan 8 Hrs.



**J. Transportation Coordinator Training (Please attach a copy of your certificate)**

Which organization provided your training? Commuter Transportation Services, Inc.

Completion of training: Date \_\_\_\_\_ Certificate Number \_\_\_\_\_

(see attached)

The initial three-day training certifies an ETC for one year. Each year thereafter, the ETC must take the SCAQMD approved update training to maintain certification. Attach initial and update certificate. If the initial certification was within the last 12 months, no update certificate is required.

**K. Plan Preparer (if other than Site Transportation Coordinator e.g., corporate transportation coordinator or consultant) must attach copy of plan preparer's training certificate.**

Preparer's Name Linda Thompson Certificate Number 003427

Company Name U. S. Postal Service

Preparer's Address 13031 Jefferson Blvd. Inglewood, Ca. 90311

Phone (301) 301-1162 Preparer's Title Safety Specialist- Employee Trans. Co

**L. Identification of Chief Executive Officer or highest ranking official at this Site**

Name David Quella Title Postmaster

**M. Branch Site Information. Headquarters and branch sites must complete this section**

(use additional sheets if necessary) This information was provided to Gordon Mize by  
Site Name USPS Regional Environment Coordinator Scott Ross.

SCAQMD ID# \_\_\_\_\_ Total No. of Employees at this Site \_\_\_\_\_

Number \_\_\_\_\_ Street Name \_\_\_\_\_ City \_\_\_\_\_ County \_\_\_\_\_ Zip \_\_\_\_\_

Site Name \_\_\_\_\_

SCAQMD ID# \_\_\_\_\_ Total No. of Employees at this Site \_\_\_\_\_

Number \_\_\_\_\_ Street Name \_\_\_\_\_ City \_\_\_\_\_ County \_\_\_\_\_ Zip \_\_\_\_\_

Site Name \_\_\_\_\_

SCAQMD ID# \_\_\_\_\_ Total No. of Employees at this Site \_\_\_\_\_

Number \_\_\_\_\_ Street Name \_\_\_\_\_ City \_\_\_\_\_ County \_\_\_\_\_ Zip \_\_\_\_\_

Site Name \_\_\_\_\_

SCAQMD ID# \_\_\_\_\_ Total No. of Employees at this Site \_\_\_\_\_

Number \_\_\_\_\_ Street Name \_\_\_\_\_ City \_\_\_\_\_ County \_\_\_\_\_ Zip \_\_\_\_\_

#### J. Transportation Coordinator Training

The current site transportation coordinator is Catherine Brewster. Her initial three day training has not yet been completed. Training will be provided by Commuter Transportation Services located at 3550 Wilshire Blvd., Los Angeles, CA 90016. The coordinator is scheduled to attend the last two days of training on January 22 and 29, 1992. As soon as the training is completed a copy of the certificate will be forwarded for your approval. Please see attached letter of confirmation.

**ADVISORY BOARD**  
**WILLIAM H. DELVINE**  
 AT&T  
**GEOFFREY ELY**  
 Building Owners and  
 Managers Association  
**ROBERT FREEMAN**  
 Texaco  
**STEVE GIOVANISCI**  
 Atlantic Richfield Company  
**JIM GOSNELL**  
 Southern California  
 Association of Governments  
**CHARLES A. GREEN**  
 General Telephone  
**DR. JACK H. IRVING**  
 Jack Irving Associates  
**MELVIN KUSHNER**  
 The Seeliey Company  
 Society of Industrial Realtors  
**SUSAN LACEY**  
 Ventura County Board  
 of Supervisors  
**DAVID MCKENNEY**  
 Cochran & Wakefield  
**SCOT MAHCUS**  
 Scot Marcus Associates  
**CHRISTOPHER C. MARTIN**  
 Albert C. Martin & Associates  
**GERALD MEISENHOLDER**  
 Jet Propulsion Laboratory  
**HUGO MORRIS**  
 Joint Council of Teamsters 442  
**THOMAS H. NIELSEN**  
 The Irvine Company  
**JACK NOVACK**  
 ZISLAF Financial Inc.  
**STAN ORTEGUE**  
 Orange County  
 Transportation Authority  
**JOHN PALEY**  
 Local Satellite Network  
**ALAN PEGGS**  
 Southern California  
 Rapid Transit District  
**DAVID EY. PHILLIPS**  
 San Francisco Bay Area  
**ERNEST POGGIO**  
 Pomona Express & Associates  
 P.O. Box 21  
 Pomona, California 91766  
**PAUL J. RAY**  
 The Irvine Company  
**THOMAS A. THOMANNSON**  
 San Joaquin County  
 Public Works Department  
**JOSEPH A. THAGASHI**  
 International Consulting, Inc.  
 10000 Wilshire Blvd.  
 The Van Nuys Division  
**DR. MARTIN WACHS**  
 University of California  
 at Los Angeles  
**WILLIAM WALKER**  
 Southern California  
 Association of Governments  
 1000 Wilshire Blvd.  
 Los Angeles, California 90024  
**WILLIAM W. WILSON**  
 Southern California  
 Association of Governments  
 1000 Wilshire Blvd.  
 Los Angeles, California 90024



## CONFIRMATION

Day 3 - 8:30 a.m. to 1:00 p.m.

Enclosures

3550 Wilshire Boulevard  
Suite 300  
Los Angeles, CA 90010  
(213) 380-7750  
FAX (213) 383-8034

THIS IS TO CERTIFY THAT

LYNDA L. THOMPSON

OF

U.S. POSTAL SERVICE

HAS SUCCESSFULLY COMPLETED AN APPROVED TRANSPORTATION  
COORDINATOR TRAINING COURSE REQUIRED BY THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
TRANSPORTATION DEMAND MANAGEMENT



I.D. NO. \_\_\_\_\_

ISSUED THIS THE 5th  
DAY OF APRIL,  
19 90

  
JAMES M. LENTS  
EXECUTIVE OFFICER

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
REGULATION XV UPDATE TRAINING

THIS IS TO CERTIFY THAT

*Lynda L. Thompson*

OF

*U. S. Postal Service*

HAS SUCCESSFULLY COMPLETED AN APPROVED TRANSPORTATION  
COORDINATOR UPDATE TRAINING COURSE REQUIRED BY THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ISSUED THIS THE *13th*  
DAY OF *February*  
19 *91*

*J M Lents*

JAMES M. LENTS  
EXECUTIVE OFFICER



I.D. NO. 003427

## Worksite Analysis

Section II must be completed by employers filing both new and annual update plans (see instructions on page 29)

### A. Freeway and Street Accessibility

Freeway	Number	Off-Ramp Name	Off-Ramp Distance from Site
San Diego	I-405	Braddock/Sepulveda	one-half mile
San Diego	I-495	Jefferson Blvd.	one-half mile
San Diego	I-405	Sepulveda/Venice	three quarters mile

(see attached)

Name major surface streets used to access site

North-South Sepulveda

East-West Jefferson

### B. Existing Parking Description

Number of Parking Spaces

Company owned on-site spaces

none

Company leased on-site spaces

68

For leased spaces, monthly cost to employer per on-site space

\$ 12.00

Company owned off-site spaces

none

Company leased off-site spaces

none

For leased spaces, monthly cost to employer per off-site space

\$ none

Estimate other off-site parking available (e.g. street parking or other public lots)

(see attached)

Preferential parking for ridesharing

Carpools 3

Vanpools none

Monthly amount of employer parking subsidy (if any) per employee per space

\$ none

Monthly parking cost to employee per space

\$ none

### C. Transit Accessibility (see attached)

Transit Provider	Route No.	Hours of operation	Frequency	Distance of bus/rail stops from site
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

## A. Freeway and Street Accessibility

<u>Freeway</u>	<u>#</u>	<u>Off-Ramp</u>	<u>Distance</u>
Santa Monica	1-10	Washington/Fairfax	1 mile
Santa Monica	1-10	Robertson/Venice	3/4 mile
90 West		Slauson	1/2 mile

B. Existing Parking Description  
(Estimate other off-site parking available)

No parking structure is in existence at the worksite. No parking is allowed at anytime on Jefferson or Sepulveda Blvds. These are the major surface streets surrounding the facility. Limited parking is available on a residential street directly across from the worksite, Janisann Ave. Pedestrian crossing is hazardous from this street because no stop sign, traffic light or crosswalk exist at this location. Employees are forced to park in the area designated for customers doing business at the post office or they must take a chance and park illegally in the customer parking for Bob's Big Boy Restaurant. (see attached map)

## C. Transit Accessibility

<u>Provider</u>	<u>#</u>	<u>Hours</u>	<u>Frequency</u>	<u>Distance</u>
Culver City	1	5:30am-11:34pm	Every 20 min.	1/4 mile
Muni. Bus	2	6:16am- 6:14pm	Every hour	1/2 mile
Line	4	6:30am- 6:20pm	Every hour	1 block
	5	7:00am- 5:48pm	Every hour	1/4 mile
	*6	5:35am-11:30pm	Every 20 min.	1 block

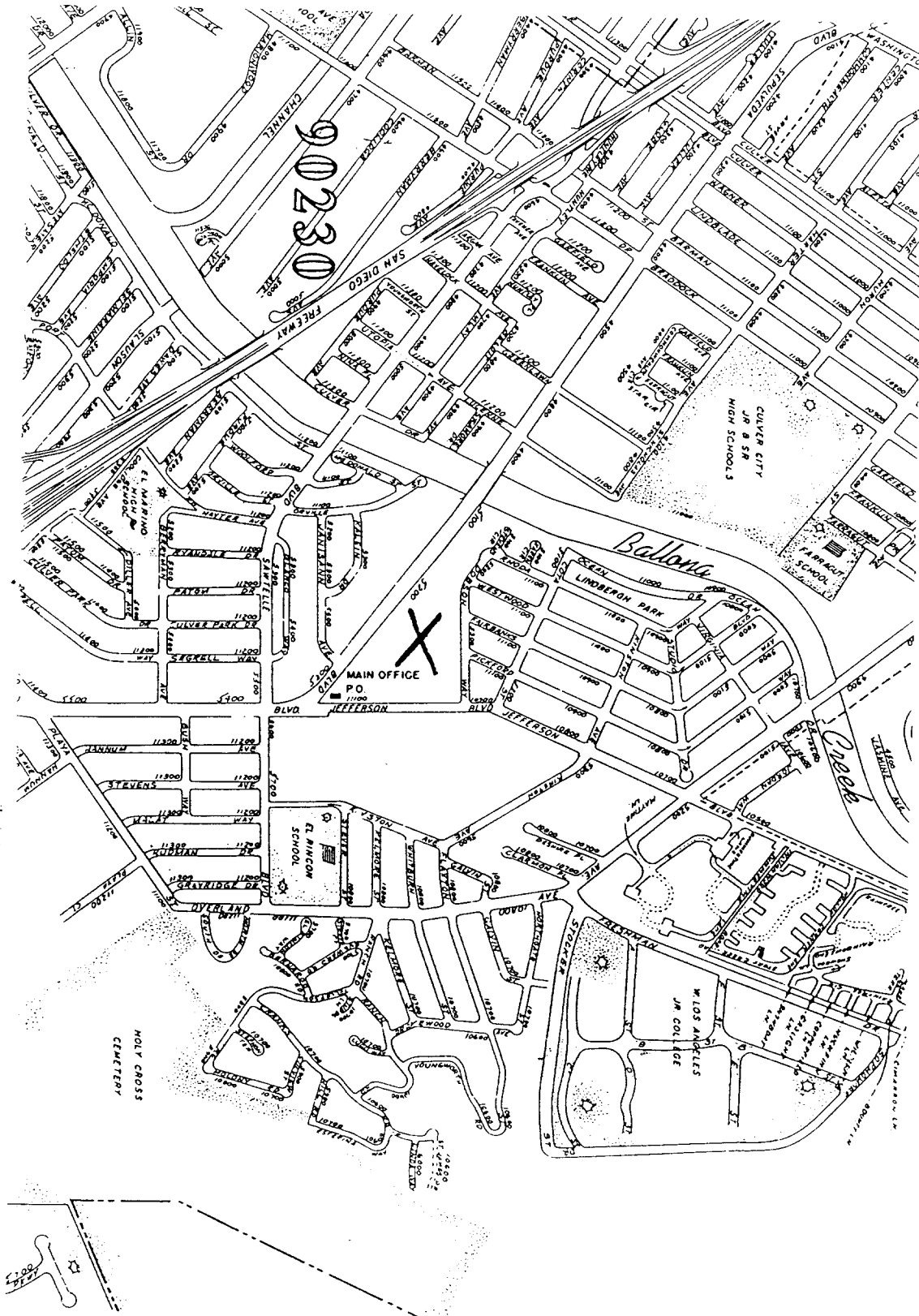
## Santa Monica Big Blue Bus

Lines 7, 8 and 12 all make connections with Culver City Municipal Bus Line \*6.

## RTD

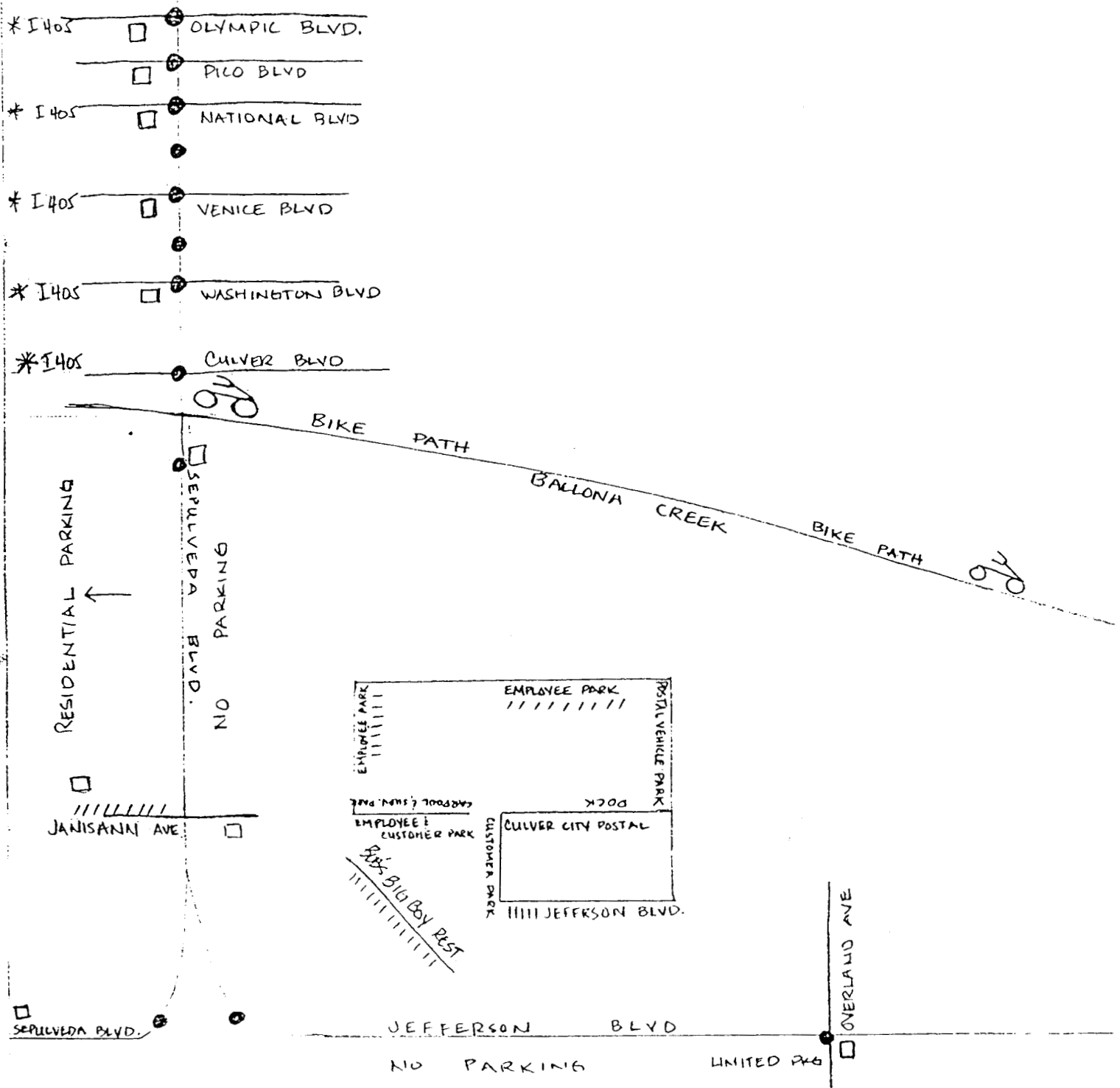
Lines 108, 110, 220, 33, 333 and 436 all make connections with the Culver City Municipal Bus Line \*6.

The Culver City Municipal Bus Line has bus stops at almost every other block on all bus routes. The majority of stops along the various bus routes do not offer shelters. A limited number of stops do have benches. Inter-agency transfers are available from the Culver City municipal Bus Line to the Rapid Transit District, Santa Monica's Big Blue Bus and Torrance Transit for the cost of 25 cents.





- A. Freeway and Street Accessibility  
 B. Existing Parking Description



● TRAFFIC LIGHT AND CROSSWALK

□ BUS STOP

\* Freeway Access Offramp

////// PARKING

🚲 BIKE PATH

**D. Bicycle Accessibility**

Are there bike paths/bikeways nearby this site?

Yes x No \_\_\_\_\_

Describe the conditions for riding a bicycle to your site (e.g. traffic lights, terrain, convenience, neighborhood safety considerations)  
(see attached)

Bicycle Lockers

How Many? none

Bicycle Racks

How Many? 1 (accommodates 4 bikes)

Clothes Lockers

How Many? 144

Showers for cyclists

How Many? none

**E. Pedestrian Accessibility**

Describe site accessibility for pedestrians (e.g. sidewalks, lighting, vehicular traffic, safety, crosswalks, signals).

(see attached)

**F. Additional Site Characteristics**

Provide any additional site characteristics that are relevant to developing a commute management plan. (e.g. on site amenities/services, other background and traffic congestion information).

(see attached)

#### D. Bicycle Accessibility

La Ballona bike path is located within one half mile of this facility. La Ballona bike path is a class 1 path that runs approximately two and three quarters miles parallel to La Ballona Creek. Lighting is available with little or no uphill climb. Intersecting this class 1 path is a class 2 and 3 path.

La Ballona bike path is situated in a desolate area with little or no visibility from the street or surrounding residents. Unsafe conditions have been reported by riders in recent months. Glass and debris are strewn over bike path causing delay and potential harm to riders. Incidents of muggings and vandalism have been on the rise in recent winter months. (see attached map)

#### E. Pedestrian Accessibility

This facility is accessible to pedestrian traffic from both Jefferson and Sepulveda Blvds. Conditions for walking to this facility are adequate. A traffic signal and crosswalk are located at the major intersection nearest the worksite. Traffic is heavy to impossible depending on the time of day and the time of year. Overhead street lighting is adequate. Sidewalks are relatively free from hoards of foot traffic. Easy access for pedestrians to shopping areas are located within one block of worksite.

Poor drainage and flooding are problems that occur during the rainy season. Poor visibility during winter months. Panhandlers begging and homeless person loitering are an annoyance to potential pedestrians. Violence in the area is on the rise. A major contributing factor to violence in the area is the teen-age "hang-out" activity in the nearby Fox Hills Mall. (see attached map)

## F. Additional Site Characteristics

On-site amenities are limited to a lounge with several vending machines (coffee, soda, candy) a microwave and a refrigerator. Worksite is located within walking distance of many restaurants, banks and other businesses.

Food	Banks	Stores
Bob's Big Boy	Security Pacific	Pavilions Grocery
Jack-in-the-Box	Culver National	Thrifty Drug Store
Burger King	Bank of America	Target
Roll n Rye Deli	First Federal	Toys R Us
Tommy's Burgers		Kids R Us
Kentucky Colonel	<u>Misc.</u>	Cash n Carry Office Sup.
Subway Sandwich	Dry Cleaners	TJ Maxx Clothing
Beef Bowl	Jewelry Repair	Designer Labels for Less
Taco Bell	Video Rental	Bookstar/bookstore
MacDonald's	Automobile Club	Ross Dept. Store
	Mark C. Bloom Tire	Fox Hills Mall
	Nursery/Gardening Supply	
	El Rincon Elementary School	

As I stated earlier crime is on the rise in this area. Therefore employees are reluctant to be without transportation even though worksite is conveniently located to all of the above named businesses. Traffic congestion problems are getting worse because of teen-age activity at the nearby Fox Hills mall.

No staff car is available to managers. Managers must use personal vehicle to supervise personnel, attend meetings, transport employees to other worksites and attend to any unforeseen problems.

Part Time Flexible clerks and carriers work fluctuating hours as needed. A vast majority of these personnel work split shifts which require them to have access to a vehicle at all times.

Eight Culver City employees are contracted to use their personal vehicle while performing work related duties. These individuals must drive a vehicle to work daily.

A vast majority of the personnel at the Culver City Post Office are mail delivery carriers. These carriers cannot take advantage of the on-site amenities or the conveniently located restaurants for lunch breaks. The nature of mail delivery dictates that carriers must remain in their assigned route delivery areas during scheduled lunch breaks.

Most of the employees that remain at the worksite during an eight hour workday have a designated thirty minute lunch break. This does not provide enough time to take full advantage of the off-site facilities without some sort of transportation.

## F. Additional Site Characteristics (Cont.)

Mandatory overtime is another impediment to employee use of alternate commute modes. Because of the nature of the mail delivery business, management never can tell when the mail volume will be very heavy and require additional work hours to ensure prompt delivery. Therefore employees do not know when they will be forced to stay past their regularly scheduled eight hour shift.

Many of our employees are single parents. They have sole responsibility for caring for their offspring. In cases like this the employee with more than one child may be required to make several different stops on the way to work, at the lunch break or on the way home from the worksite. These employees are not likely to rideshare or use any alternate mode of commuting. (see attached map)

F. Additional Site Characteris

WALDONALDS

ONUTS

RESIDENTIAL  
AREA

WATCH  
REPAIR

RESIDENTIAL  
AREA

AUTO CLUB  
OF SO. CALIF.

HIGHWAY  
PATROL

STUDIO  
DRIVE-IN

WORKSITE  
(Culver City  
Post Office)

BOB'S  
BIG BOY  
REST.

DENNYS

MINI-MALL

ALPH.  
BET.  
GRO

RESIDENTIAL  
AREA

SUBWAY  
SANDWICH

CHINESE  
FOOD

BURGER  
KING

TARGET

ROSS

MINI-MALL

SMALL BUSINESS

CASH & CARRY OFF. SUP	TOYS R US	THRIFTY DRUG	PAVILLION GROCERY	TJ MAXX	SECURITY PACIFIC BA
ROLL N RYE DELI	DRY CLEANERS	ANNAS LINENS	KIDS R US CLOTHING	DESIGNER LABELS FOR LESS	

EL RINCON  
ELEMENTARY SCHOOL

JACK IN  
THE BOX

SORRENTO  
MARKET

NURSERY

KENTUCKY  
COLONEL

RESIDENTIAL  
AREA

FIRST  
FEB.

FOX HILLS  
MALL

## Employee Data By Work Site

Section III must be completed by employers filing both new and annual update plans (see instructions on page 29)

### A. Employee Work Profile Data

Total no. of employees at this site

1. 95

Number of employees who report  
to work between 6am and 10am  
Monday through Friday

2. 71 \*

*This number must include every employee who reports to work between 6am and 10am, even once a week.*

Indicate number of employees reporting to the site in each time period below:

No. of employees 19 Midnight - 5:29am \*

No. of employees 2 5:30am - 5:59am \*

No. of employees 3 10:01am - 11:59pm \*

\* When added together, the number of employees in these time periods should equal the total number of employees at the site. If there is any discrepancy, please attach explanation.

#### Employee Job Categories

Please show the percentage of employees working in each job category. For job categories not shown here, include job category (as defined by your Personnel/Human Resources Department) and the percentage of employees working in that job category. Definitions of job categories can be found in the Glossary of the Trip Reduction Plan instructions. (Whole numbers only)

JOB CATEGORY		
Officials/Administrators	6	%
Professional		%
Technical		%
Clerical Dist. & Window	30	%
Skilled Craft Carrier	44	%
Service/Maintenance	1	%

JOB CATEGORY		
Sales & Associates		%
Semi-skilled		%
Other 1 Part time Reg. Clerk	1	%
Other 2 Part time Reg. Carrier	1	%
Other 3 Ptf clerk	7	%
Other 4 Ptf carrier	10	%

### B. Employee Geographic Location Data

You *must* provide employee data by zip code (use form III-2 provided).

**DO NOT SEND A LIST OF YOUR EMPLOYEES**

**PART-TIME-FLEXIBLE (PTF) LETTER CARRIER=**

This employee is utilized to fill letter carrier route vacancies and to provide auxiliary assistance based on daily operational needs. This employee's start time and end time can vary daily. This employee can eventually become a full-time letter carrier.

**PART-TIME-FLEXIBLE (PTF) CLERK=**

This employee is utilized to assist in the distribution of mail. This employee's start-time and end-time can fluctuate based on operational needs. (mail volume). This individual can eventually become a full-time clerk.

**PART-TIME- FLEXIBLE (PTF) MAILHANDLER=**

This employee is utilized to assist in the distribution of mail. This position does not require the same skill level as that of a clerk. This employee's start-time and end-time varies. This individual can eventually become a full-time mailhandler.

**CASUAL LETTER CARRIERS, CLERKS, AND MAILHANDLERS=**

These employees are hired for 90-day time blocks. (Maximum 180 days). Their start times and end times vary. They are only temporary employees and are often hired to accommodate seasonal increases in mail volume.



## Employee Data By Zip Code

Section III must be completed by employers filing both new and annual update plans (for employees who report to work between 6am and 10am)

ZIP CODE	NUMBER OF EMPLOYEES	ZIP CODE	NUMBER OF EMPLOYEES
90008	2	90260	2
90016	2	90277	1
90018	2	90291	2
90019	1	90302	1
90029	1	90305	1
90032	1	90405	1
90034	2	90421	1
90035	1	90501	1
90037	1	90723	1
90042	1	90805	1
90044	2	90806	1
90045	5	91306	1
90047	2	91311	1
90059	1	91706	1
90065	1	91733	1
90066	4	91744	1
90230	11	91754	1
90232	4	91801	1
90247	1	92336	1
90249	1		
90250	4		

## Survey Methodology/ Average Vehicle Ridership (AVR)

*Section IV must be completed by employers filing both new and updated plans. Use AQMD approved survey forms only. Attach a blank survey Form. (see instructions on pages 30-31.)*

### A. Survey Methodology

Describe the survey methodology used to obtain the data used to calculate your Average Vehicle Ridership (AVR).

1. Passed out notice to employees regarding upcoming survey,
2. Forms given to target employees within the 6-10am window.
3. Explanation given on the correct way to fill out forms.
4. Forms collected from employees.
5. Forms checked for errors and completeness.
6. Surveyed absentees.
7. Insured we had minimal response of at least 75%.
8. In order to achieve maximum participation an additional attitudinal survey was also completed.

71

Number of Surveys Received

100%

Response Rate

### B. Survey Data Collected by

Catherine Brewster                      Steven Henry  
Linda Thompson  
Bernadette Estrera

### C. Week Survey Was Taken (Provide Dates)

The representative week the survey was taken was Monday  
October 21, 1991 through Friday October 25, 1991.

### D. Location Where Data is Stored

Filing Cabinet (top drawer)  
Safety Office  
Culver City, Post Office



## AVERAGE VEHICLE RIDERSHIP (AVR) SURVEY

ANSWER ALL QUESTIONS COMPLETELY OR YOUR SURVEY WILL NOT BE PROCESSED. PLEASE USE INK.

\_\_\_\_\_  
FIRST NAME

\_\_\_\_\_  
LAST NAME

\_\_\_\_\_  
HOME ZIP CODE

\_\_\_\_\_  
TODAY'S DATE (M/D/Y)

1. What time did you start work and quit work each day last week? If you worked at home any day last week, please indicate start and stop times. (Circle am or pm. Leave the box blank if you did not work on that day.)

	MONDAY 10/21	TUESDAY 10/22	WEDNESDAY 10/23	THURSDAY 10/24	FRIDAY 10/25
Start work	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>
Quit work	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>	<div> <div></div> <div>am</div> </div> <div> <div></div> <div>pm</div> </div>

1.1 Do you regularly start work between 6:00-10:00 a.m.? ☐ Yes ☐ No

2. Skip to question #3.

3. How did you travel to work each day last week? (Please write the appropriate letter for each day in the boxes below. Do not leave any blank.)

Please use the following definitions: CARPOOLED - traveled with one or more working adults, including working family members  
VANPOOLED - shared a ride in a van with at least 7 working adults, including yourself

A = Drove alone  
B = Motorcycled  
C = 2 person carpool  
D = 3 person carpool  
E = 4+ person carpool  
F = Vanpooled  
G = Rode private bus or buspooled  
H = Rode public transit (bus or rail)  
I = Walked or jogged  
J = Bicycled  
K = Did not travel to work

MONDAY 10/21	TUESDAY 10/22	WEDNESDAY 10/23	THURSDAY 10/24	FRIDAY 10/25
<div></div>	<div></div>	<div></div>	<div></div>	<div></div>

3.1 If you traveled to work any day last week in a vanpool, including yourself, how many total persons were in the van? \_\_\_\_\_ persons

4. Where did you begin work each day last week? (Please write the appropriate letter for each day in the boxes below. Do not leave any blank.)

A = Regular work location  
B = Another company or branch  
C = Telecommuted (worked at home or a satellite work center)  
D = Did not work due to illness  
E = Did not work due to vacation/holiday  
F = Regular day off  
G = Jury Duty or Travel Outside of SCAQMD Region

MONDAY 10/21	TUESDAY 10/22	WEDNESDAY 10/23	THURSDAY 10/24	FRIDAY 10/25
<div></div>	<div></div>	<div></div>	<div></div>	<div></div>

Thank you for your cooperation!



# Commuter Survey

Please complete this form in ink. This information will be kept confidential and used only for ride-matching purposes.

In completing this information, it is my understanding that state law (Assembly Bill 3984) indicates: "No person who, in the course of business, acquires or has access to personal information concerning an individual...for the purpose of assisting private entities in the establishment or implementation of carpooling or ridesharing programs, shall disclose that information to any other person or use that information for any other purpose without prior written consent of the individual."

Have you ever applied to a carpool matching program before?

Yes ☐ No ☐

1 \_\_\_\_\_ 2 \_\_\_\_\_  
First Name or Initial Last Name

3 \_\_\_\_\_  
Nearest Major Intersection to Residence (No freeways or P.O. boxes please)

4 \_\_\_\_\_ 5 \_\_\_\_\_  
City Zip Code

3019 N BELLFLOWER BLVD

6 \_\_\_\_\_  
Work Address

7 \_\_\_\_\_  
Enter Your Pay Location

8 \_\_\_\_\_  
(Leave blank)

9 Work Phone \_\_\_\_\_ 10 Home Phone \_\_\_\_\_  
Area Code Telephone Extension (optional) Area Code Telephone

11 I can best be reached at... ☐ Home ☐ Work

12 My normal work hours are... ☐ AM ☐ PM  
Start Time End Time

13 The following best describes my schedule: 14 I commute the following days:

- ☐ My schedule is about the same each day  
☐ My schedule may vary up to 1/2 hour  
☐ My hours vary daily from week to week

Monday through Friday  
OR  
(Check all days that you might ~~ever~~ work)  
Sun Mon Tue Wed Thu Fri Sat  
☐ ☐ ☐ ☐ ☐ ☐ ☐

15 I normally commute:  
(check one only)

- ☐ Drive Alone ☐ Motorcycle  
☐ Carpool ☐ Bicycle  
☐ Vanpool ☐ Walk  
☐ Public Bus ☐ Private Bus

16 I would like to receive a matchlist ☐ Yes ☐ No  
(If yes, please check one only)

- ☐ I would consider ridesharing on a regular basis  
☐ I would consider ridesharing on an occasional basis

For Office Use

10/03/91  
L-71 -C6 116; 71

**USPS EMPLOYEE TRANSPORTATION SURVEY  
APPENDIX SURVEY**

The USPS is in the process of submitting this years Trip Reduction Plan as required by Regulation XV. As part of this process, we are requesting information concerning the types of incentives and travel modes the employees prefer. This information is confidential.

1. What time do you leave home for work?

\_\_\_\_:\_\_\_\_ am/pm

2. What time do you arrive at work?

\_\_\_\_:\_\_\_\_ am/pm

3. What is the average time you spend commuting to work?

\_\_\_\_\_ minutes

4. What is your current start time at work?

\_\_\_\_:\_\_\_\_ am/pm

5. How satisfied are you with your commute?

- a. Very Satisfied
- b. Satisfied
- c. Disatisfied
- d. Very Disatisfied

**Answer if you currently carpool and/or vanpool to work, otherwise skip to question 7.**

6. With whom do you currently carpool and/or vanpool to work? (Please circle all that apply.)

- a. USPS employee (household/non-household member)
- b. Adult household member who is not a USPS employee
- c. Non-household member who is not a USPS employee
- d. Child
- e. Other (Please specify)\_\_\_\_\_

7. What percentage of your commute trip do you share a ride? (Please circle one.)

- a. 1 to 25%
- b. 25 to 50%
- c. 50 to 75%
- d. 75 to 100%

Answer if you drive alone at least 3 days per week, otherwise skip to question 9.

8. Why do you drive alone? (Please circle all that apply.)
- a. Voluntary overtime
  - b. Work hours vary (Please explain) \_\_\_\_\_
  - c. Child care or school transportation concerns
  - d. Need my car for business reasons  
(Please explain) \_\_\_\_\_
  - e. Need my car for errands  
(Please explain) \_\_\_\_\_
  - f. Don't know anyone with whom to ride with
  - g. Saves time to drive alone
  - h. Live too close to work to carpool
  - i. No public bus available
  - j. Other (Please explain) \_\_\_\_\_

Answer if you do voluntary overtime, otherwise skip to question 11.

9. How many days a week do you volunteer overtime?

\_\_\_\_\_ days

10. What is the typical length of the overtime period?

\_\_\_\_\_ minutes

Answer if you currently drive alone to work, otherwise skip to question 12.

11. What would encourage you to not drive alone at least 3 days a week? (Please circle three.)
- a. Bus route and scheduling information
  - b. Help finding USPS employees with whom to carpool
  - c. Sale of bus tickets/passes at the worksite
  - d. A free matchlist of neighbors interested in carpooling or vanpooling to work
  - e. Preferential parking spaces
  - f. Guaranteed ride home in the event of an emergency or unforeseen overtime
  - g. Shuttle buses to the bus stop
  - h. Shuttle buses for lunch or shopping
  - i. Earned time-off for carpooling
  - j. Cash allowance to cover your commute cost
  - k. Flexible work hours
  - l. Monthly raffles/drawings for prizes for those who do not drive alone
  - m. Social activities such as barbeques for those who do not drive alone
  - n. Other (Please specify) \_\_\_\_\_

12. What is your monthly commute cost? (If you drive to work, consider the following: gas, insurance, and maintenance.)

\$\_\_\_\_\_ per month

## Weekly Employee Survey Form

Section IV must be completed by employers filing both new and updated plans

Please read instructions on IV-2A (back of this form) before completing. (Provide this form to employees who report to work between 6:00 a.m. and 10:00 a.m. with instructions).

Please make a check (✓) for each day indicating how you arrived at work last week (only one check mark for each day)

MODE	MON	TUES	WED	THURS	FRI	TOTAL
A. Drive Alone	45.0	43.0	42.0	46.0	48.0	224.0
B. Motorcycle	2.0	1.0	2.0	1.0	2.0	8.0
C. 2 person carpool	5.0	4.0	5.0	5.0	7.0	26.0
D. 3 person carpool						
E. 4+ person carpool						
F. Vanpool (F1) <input type="checkbox"/>						
G. Buspool						
H. Public transit (bus/rail)	1.0	1.0	1.0	1.0		4.0
I. Walk	2.0	3.0	2.0	2.0	1.0	10.0
J. Bicycle						
K. Telecommute						

L. Report to another site

2.0	2.0	4.0	3.0	4.0	15.0
-----	-----	-----	-----	-----	------

Check 'L' only if you drive alone to another site. Otherwise, see instructions.

**Compressed Work Week Credit (Please indicate your days off (M-F only) with a check (✓) in the appropriate box.)**

M 3/36 work week

N 4/40 work week

O 9/80 work week


**Days Off during the week of the survey (Please indicate with a check (✓) in the appropriate box)**

P. Vacation

Q. Sick

R. Other

3.0	4.0	3.0	1.0	1.0	12.0
2.0	2.0	2.0	2.0	2.0	10.0
8.0	11.0	10.0	10.0	7.0	46.0

## Weekly Employee/Vehicle Calculation

Section IV must be completed by employers filing both new and updated plans.

		TOTAL EMPLOYEE TRIPS		TOTAL VEHICLES	
	Mode	Column 1	Column 2		Column 3
A	Drive alone	224.0	A divided by 1	=	224.0
B	Motorcycle	8.0	B divided by 1	=	8.0
C	2 person carpool	26.0	C divided by 2	=	13.0
D	3 person carpool	0.0	D divided by 3	=	0.0
E	4+ person carpool	0.0	E divided by 4	=	0.0
F	Vanpool	0.0	F Total vans used	=	0.0
G	Buspool	0.0	G Total buses used	=	0.0
H	Public transit (bus/rail)	4.0			
I	Walk	10.0			
J	Bicycle	0.0			
K	Telecommute	0.0			
L	Report to another site	15.0	L divided by 1	=	15.0
L1	No survey response	0.0	L1 divided by 1	=	0.0
			S Subtotal		260.0
<b>Compressed Work Week Credit (days off)</b>					
M	3/36 work week	0.0			
N	4/40 work week	0.0			
O	9/80 work week x 0.5	0.0			
W	Total employee trips	287.0	T Total vehicles*		260.0
<b>Days Off</b>					
P	Vacation	12.0			
Q	Sick	10.0			
R	Other	46.0	(46 non 6-10 trips)		

W + P + Q + R divided by 5 should be equal to box A2 on page 10 (Form III-1).

\*If Clean fuel vehicles are used for commuting from home to work, use Appendix B to calculate credit.

\*This number is a large percentage to our varied workforce, as described on page III-I, because of rotating, regularly scheduled Monday through Friday days off.



## AVR Planning Form

*Section IV must be completed by employers filing both new and updated plans*

1. Total employees trips generated Monday through Friday between 6:00 am - 10:00 am inclusive (Column 1 (W) Form IV-3). 1. 287.00
2. Total vehicles arriving at the worksite Monday through Friday between 6:00 am - 10:00 am. (Column 3 use (T) if claiming clean fuel vehicle credit, otherwise use (S) Form IV-3) 2. 260.00
3. Divide line #1 by line #2 for current AVR 3. 1.10
4. Enter AVR target here. 4. 1.50
5. Prior year AVR (leave blank if filing for first year) 5. 1.06
6. Divide line #1 by line #4 to compute your Regulation XV allowable vehicles. 6. 191.33
7. Subtract line #6 from line #2. This is your necessary vehicle reduction to reach your target AVR. 7. 68.67
8. Divide line #7 by the averaging period of 5 days to calculate necessary daily vehicle reduction to reach your target AVR. 8. 13.73

## Status/ Update of Existing Program

*Section V must be completed by employers filing both new and annual update plans (see instructions on page 32)*

**A-1 Evaluate why you did or did not attain your target AVR (Leave blank if filing initial plan).**

(see attached)

**A-2 Explain how this plan is expected to succeed in achieving your target AVR.**

(see attached)

### A-1 Goals and Objectives

- \* To comply with Regulation XV by achieving a target AVR of 1.5 at the Culver City Post Office between the hours of 6:00 and 10:00 am - Monday through-Friday.
- \* To utilize current survey data and site analysis identifying and responding to existing opportunities and obstacles in attaining targeted AVR of 1.5.
- \* To implement incentives that will enhance and encourage wider employee participation in their use of alternate commute modes, specifically car-pooling, bicycling, bus ridership and walking.
- \* To increase employee awareness and educate personnel on the importance and benefits of ridesharing, personally and its impact upon the community as a whole.

### Additional Goals & Objectives

- \* To increase the employee transportation coordinator's education through workshops, seminars and the distribution of related materials.
- \* To implement a workable and realistic program that would involve all levels of management.
- \* To continue union outreach.

### A-1 Discussion of Last Year's Plan

Culver City Post Office's first year of implementing Regulation XV strategies increased the overall AVR from 1.06 to 1.10. Even though the target AVR of 1.5 was not achieved, we tried to establish an ongoing program that would encourage further participation and total commitment by affected employees. Basically, we used this first year to create awareness of the program. One of our goals was simply to launch an organized, realistic program that would ignite interest and promote participation.

The first year proved to be very difficult for several reasons. The certified Employee Transportation Coordinator was promoted and left this position mid-year. The current ETC has not yet completed the initial three day training (training will be completed January 29, 1992, copy of certificate will be forwarded for your approval).

We conducted our annual survey based on commute activities for the week of October 21 through October 25, 1991. We achieved a 100% response rate, which gives us an accurate picture of alternate commute modes being used by Culver City Post Office employees. The following chart compares last years survey results with this years, revealing the successes and failures of our first year's efforts.

Mode	LAST YEAR		THIS YEAR	
	Employee Trips per day	Vehicles Reduced per day	Employee Trips per day	Vehicles Reduced per day
2 CP	2.8	1.4	5.2	2.6
3 CP	0	0	0	0
VAN	0	0	0	0
WALK	0	0	0	0
BIKE	1	1	0	0
BUS	1	1	.8	.8
TOTAL	4.8	3.4	8.0	5.4

On the basis of our survey results, improvements were realized with our two person carpool and pedestrian commuters. Last year's survey included a window of 5:30 - 10:00 am. This year's survey window hours were changed to 6:00 - 10:00. As a result of this change in survey hours we lost our bicycle commuter.

Our office observed National Ride Share Week, giving special emphasis to Tuesday, September 24, 1991 National Ride Share Day. We kicked off the week with donuts and coffee for all employees. Stand ups and/or discussions were given at which time all employees were asked to do their share for cleaner air for just one day. On the morning of September 24, 1991 each participant was met at the door with a big smile, a thank you and a See's candy sucker with a note attached to it that read 'Thanks for doing your share for cleaner air'. As a result of our efforts on this day a pedestrian commuter joined the ranks. Our guaranteed ride home program let employees know that we were offering more than just lip service. As a result of this incentive an employee who commutes from another city joined our ridesharing family.

Even though we put forth our best effort to launch a program that would ignite interest and promote participation it proved to be a very difficult task. Employee moral on the whole is very low. Many employees were unable to comprehend the total benefit of ridesharing. These employees refused to participate voluntarily because they mistakenly believe that management will be the only party to benefit from these efforts. We made every attempt to reach these individuals. The on-site commuter bulletin board was regularly updated with information on current commute options,

health hazards as well as benefits, bus schedules and time saving techniques. Information from publications such as Crossroads and ACT were given to employees with their paychecks.

Our monthly drawing for alternate commute mode participants has not been as successful as we had initially hoped. One entry ticket is given for each day an employee participates in any alternate commute to the worksite. We have tried to make these drawings - high profile events with all employees gathered about and non participants helping out by choosing tickets. Even though a fifty dollar gift certificate or fifty dollars in merchandise is awarded to the winner, we have not witnessed a great deal of enthusiasm by employees.

The biggest detriment to our success was the problem of overtime and flexible work hours. The postal service is set up for its employees to work eight hour days but the reality is that we are at the mercy of the flow of mail and very few employees work a standard 9 to 5 day. We deliver mail six days per week with employees on rotating day off schedules which further impedes the matching process. At this point we have no resolution to the overtime problem but are directing our efforts toward those employees who work consistent eight hour days.

The revised work schedule incentive has been in place for the past year. This incentive will permit participating employees to change scheduled days off to coincide with another employee to allow flexibility to carpool or use an alternate commute mode on a daily or even an occasional basis. To date this incentive has been responsible for the reduction of one car at our worksite.

Preferential parking for car-poolers has been available throughout the past year's plan. This incentive states that employees who carpool will have reserved parking spaces. These spaces should be located near the employees' entrance. Our current carpoolers do not choose to always park in these spaces. As a result these spaces have proven very hard to monitor. Because they are vacant most of the day, customers dropping off mailings and doing business in the post office park their car in these reserved sights. Even though we have limited postal employee parking this incentive has not sparked a great deal of interest among employees.

A bicycle rack was purchased and secured under an awning on the rear dock to protect employees and bicycles from weather elements. An air pump and a french tire adapter are available for use by all bicyclers. We are expecting an increase in the number of bicycle riders when the time changes in April. the winter months and poor weather conditions have proven to be a further hindrance in the successful implementation of our program.

Bus routing information has been and is currently available at the centralized information center. Many employees have expressed a fear of using public transportation due to increased crime in the area. As I stated earlier the close proximity of the Fox Hills Mall is an enticement to teenagers and others, who do not live in the areas, to loiter and just "hang out". As a result of this buses are overcrowded with unruly children.

Rideshare matchlisting did not prove to be a very effective tool in last year's plan. Matchlisting was done among postal employees only. Because of the erratic work schedules and varying starting hours very few if any matches were discovered. Many employees displayed an interest at the onset of the survey but became discouraged with the findings.

## A-2 Discussion of second year plan.

Our second year plan is being met with a great deal of excitement and enthusiasm. We are optimistic that our proposed plan will encourage more participation and help to overcome some of the roadblocks that we encountered in the first year. The current ETC will be certified by January 29, 1992. This should provide continuity in the program that we were not able to accomplish in our first year's plan.

We have "polished" and/or revised current incentives. We have introduced new incentives that promise a greater degree of employee participation. Our second year plan offers a clearly stated definition of our total commitment.

A quarterly newsletter, titled "The Postal Pedal'r" will be distributed to all employees. We will use this newsletter to get the word out that we are committed to doing our share for cleaner air. All employees will be encouraged to participate by sharing talents, ideas and enthusiasm.

All management will be more directly involved. The employee transportation coordinator and the Postmaster will meet on the first Tuesday of each accounting period at 10:30 am. We will take this opportunity to review and discuss further implementation of the plan. We will be attempting to keep all lines of communication open in hopes of achieving our target AVR of 1.5. Managers and Supervisors will be encouraged to recognize outstanding commuters by giving periodic "awards of recognition". They will be encouraged to take a more active role in the promotion of ridesharing at the worksite. We are hopeful that this will help to eliminate some of the 'mistrust' that exists between craft employees and management regarding the benefits of ridesharing.

The main goal of this year's plan is to further reduce the number of single occupant vehicle commuters. The approaching summer months should help us to achieve a greater number of participants in the bicycling and walking modes. Therefore we have planned a 'back to summer kickoff' on Friday, April 10. Refreshments will be served and all who attend will receive a T-shirt or some other promotional item. To encourage further participation we will offer a pair of tennis shoes (not to exceed \$50.00) to all employees who walk or ride a bike to work at least three days a week for six weeks between June 1 and July 31, 1992. Employees will be given a \$50.00 gift certificate to the sporting goods store of their choice. We will promote this on-the-clock event with paycheck stuffers and stand-up talks or discussions.

We will give greater attention to our preferential parking spaces. Signs are being made to better distinguish spaces and the paint is being freshened. We will threaten to tow any vehicle that parks without a permit in hopes of discouraging even occasional offenders.

Our guaranteed ride -home program providing a way home to ridesharers or alternate commuters in an emergency through rides from fellow employees has been improved. The Emergency Ride Home Agreement has been established. This incentive will provide a taxi or a rental car free of charge to alternate commuters in an emergency.

We will 'sweeten the pot' with a new incentive that will reward each commute mode individually. Every AP we will reward those individuals who have proven to be totally committed to each mode. The higher the level of participation, the greater the possible number of points earned. As an employee begins to earn points, they may be motivated to increase ridesharing in order to accumulate more points faster. This will enable them to win at a higher monetary value and will decrease our daily SOV trips.

The policies of bicycle parking, clothing lockers and the availability of repair equipment will continue. We have added to this incentive by the formation of a Breakfast Bike Club. Token gifts are available to all who are interested in registering. We will encourage participation with our back to summer kickoff and contest.

Our commuter information center will continue to provide current bus schedules, maps, health information and commuter updates. We will offer sign up sheets for all those interested in carpooling, walking or biking.

Our existing monitoring system which tracks alternate commute activity each month will continue to be utilized allowing us to evaluate participation and address program needs. Through our 'hands on' experience in TRP implementation, we have learned much. Many improvements have been developed through trial and error and knowledge gained from day to day experiences in this evolving process. We will continue to update and improve our methods as the needs arise and the circumstances dictate.



Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_X\_\_(Revised)

New Incentive \_\_\_\_\_

Incentive: Bicycling

(Description of incentive program)

All employees who are currently or begin to ride a bike to work will be eligible to become a member of the Breakfast Bike Club. After registering with the Transportation Coordinator, the employee will receive a token gift (bike lock, hip bag, bike reflector, etc.). Personalized matching of bike riders for bike pools, safety information, bike routes and educational outreach will be topics covered at the monthly Breakfast Bike Club meetings. At the first meeting, a Bike Club Coordinator will be appointed to coordinate future meetings and bike events. All bike riders will be eligible for the monthly point system awards (refer to Point Award Incentive). To encourage increased participation in this mode the USPS will provide a bike tire patch and pump kit. Lockers are available for all bike riders. A bike rack is available on the rear dock of the Post Office covered by an awning. Additional bike racks will be installed as needed.

How are you marketing this incentive to your employees?

An initial flyer will be sent around inviting interested participants to join in the formation of the USPS Breakfast Bike Club. Follow-up flyers will announce upcoming meetings. As the club becomes more established (and thinks of a better name), a poster will be designed with the name and number of the Bike Club Coordinator on it. A feature article in the newsletter will promote the benefits of joining the club and the various support services/amenities USPS offers to all commute cyclists.

How much staff time per week will be required to develop and implement this incentive?

One to two hours per week. Additional hours will be provided as needed.

How will the incentive be monitored and evaluated?

The ETC will monitor this incentive through the employee participation forms. The Bike Tire Patch and Pump Kit are located in the office of the ETC.

What Transportation Mode(s) are impacted by this incentive?

Bicycling

Participation

Current number of employees participating     0    

Projected number of employees participating     3    

This incentive will be implemented no later than 30 days after plan approval.

VI-1

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive \_\_X\_\_

Incentive: Manager & Supervisor Support  
(Description of incentive program)

Managers and Supervisors play an important role in implementation of a successful rideshare program in that they have direct contact with the employees and the ETC on a daily basis. The USPS will educate and advise these personnel on ridesharing recruitment and promotions. Additionally, Management will be encouraged when possible to provide ridesharers with at least a 24 hours notification if they are scheduled to work overtime. This policy will enable ridesharers to make other travel arrangements during overtime situations. Managers and Supervisors will be encouraged to recognize outstanding commuters by giving them "Awards of Recognition". To further ensure successful implementation of Regulation XV the ETC and the Postmaster will meet and confer on the first Tuesday of every AP at 10:30am.

How are you marketing this incentive to your employees?

Support will be encouraged through a series of memos, meetings, and presentations to key management personnel.

How much staff time per week will be required to develop and implement this incentive?

One to two hours per week. Additional hours will be provided as needed.

How will the incentive be monitored and evaluated?

Incentive will be monitored through memos and minutes of meetings.

What Transportation Mode(s) are impacted by this incentive?

All modes.

**Participation**

Current number of employees participating \_\_\_\_0\_\_\_\_

Projected number of employees participating \_\_\_\_10\_\_\_\_

This incentive will be implemented no later than 30 days after plan approval.

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive \_\_X\_\_

Incentive: Point Award Incentive (Multi-Modal)

(refer to attachment)

(Description of incentive program)

This incentive is anticipated to have the greatest impact of USPS employees. The goal of this program is to directly reward employees who use an alternate transportation mode other than a SOV even on a part time basis. The first year plan included a raffle prize reward structure that did not promote direct rewards according to participation level and mode. As an employee begins to earn points, they may be motivated to increase ridesharing in order to accumulate more points faster. This will enable them to win at a higher monetary value and will decrease our daily SOV trips.

How are you marketing this incentive to your employees?

A campaign called "Get the point(s)", will be conducted utilizing posters/flyers, paycheck stuffers, newsletter articles, and stand up presentations. After this incentive is introduced and established, it will be included in the USPS rideshare program brochure.

How much staff time per week will be required to develop and implement this incentive?

Three to four hours per week. Additional hours will be provided as needed.

How will the incentive be monitored and evaluated?

Incentive will be monitored through the employee participation form and the rideshare tracking document.

What Transportation Mode(s) are impacted by this incentive?

All modes.

**Participation**

Current number of employees participating \_\_\_\_0\_\_\_\_

Projected number of employees participating 40

This incentive will be implemented no later than 30 days after plan approval.

**INCENTIVE: POINT AWARD INCENTIVE (MULTI-MODAL)**

This incentive is anticipated to have the greatest impact on USPS employees. The goal of this program is to directly reward employees who use an alternate transportation mode other than a single occupancy vehicle (SOV) even on a part-time basis. The first year plan included a raffle prize reward structure that did not promote direct rewards according to participation level and mode. As an employee begins to earn points, they may be motivated to increase ridesharing in order to accumulate more points faster. This will enable them to win at a higher monetary value and will decrease our daily SOV trips. Employees commuting to work between 6:00 a.m. and 10:00 a.m. on Monday through Friday will be allocated points according to the following scale;

<u>Points</u>	<u>Mode</u>
0	Drive Alone
2	2-person carpool
3	3-person carpool
4	4-person carpool
5	5+ person carpool
5	Vanpool
5	Public Transit
5	Bike
5	Walk

A maximum dollar amount (To be Determined) will be rewarded each Accounting Period (AP), 28 calendar days, based on a total of number of points valued at (Insert Value of a Point) earned during the AP.

$$\text{Total \$ Award} = (\# \text{ of Points Earned}) \times (\text{Point Value})$$

By the (insert desired timeframe) working day of the following AP, the employee will complete the attached "Rideshare Tracking Document" (reporting travel behaviors) and claim for reimbursement form then submit them to the site ETC. The names of ridesharers will be recorded on the Rideshare Tracking Document for verification purposes. In complete, or late submissions of the required forms will not be accepted by the ETC. The exact dollar awards to be received by the employees are pending.

**Marketing Strategy (General Program):**

A campaign, called "GET THE POINTS", will be conducted utilizing posters/flyers, paycheck stuffers, newsletter articles, and stand up presentations (see marketing Outline). After the Point Award Incentive is introduced and established, it will be included in the USPS rideshare program brochure.

# RIDESHARE TRACKING DOCUMENT

-----  
 (PRINT - Name) \_\_\_\_\_ (Pay Location) -----

Reporting Time to work: \_\_\_\_\_

Accounting Period \_\_\_\_\_

Use the following  
 codes to indicate  
 your commute mode:

	SUN	MON	TUES	WED	THU	FRI	SAT	
A - Drove Alone								
D - Driver of Carpool								
R - Rider of Carpool								
V - Vanpool								
P - Public Transit								
Bus/Rail								
B - Bicycle								
W - Walk								
M - Motorcycle								
X - Other								

"AP presented with Days and Dates of  
 Months covered"

Use the following  
 codes in addition  
 to the above codes:

- 5 - Public Transit  
    Bus/Rail
- 5 - Bicycle
- 5 - Walk
- 5 - 5+ person Carpool
- 4 - 4+ person Carpool
- 3 - 3 person Carpool
- 2 - 2 person Carpool
- 0 - Motorcycle
- 0 - Drove Alone

For Administrative  
 Purposes Only:

Names of Ridesharers:

-----  
 -----  
 -----  
 -----  
 -----

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_X\_\_(REVISED)

New Incentive \_\_\_\_\_

Incentive: Flexible Scheduling (Multi-Modal)  
(Description of incentive program)

The USPS will offer flexibility in start times to facilitate ridesharing activities. Schedule changes will not exceed one hour variance and are applicable to operations when such a change would not have a negative impact on mail flow. Flexible schedules are subject to approval from the Postmaster or Superintendent of Postal Operations and Union Officials, by use of PS form 3189. This program is dictated by existing written USPS policy and contracts. In last years plan this incentive was limited to carpoolers only, this year we will expand the program to include all alternate modes of transportation.

**How are you marketing this incentive to your employees?**

A flyer will be developed announcing the expansion of the flexible schedule option to all modes. This option will be the subject of a short newsletter article and mentioned in the USPS rideshare program brochure.

**How much staff time per week will be required to develop and implement this incentive?**

One to two hours per week. Additional hours will be provided as needed.

**How will the incentive be monitored and evaluated?**

Incentive will be monitored by the ETC and PS form 3189.

**What Transportation Mode(s) are impacted by this incentive?**

All modes

**Participation**

Current number of employees participating \_\_\_0\_\_\_

Projected number of employees participating \_\_\_3\_\_\_

This incentive will be implemented no later than 30 days after plan approval..

## Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive ☒X\_\_\_

New Incentive \_\_\_\_\_

Incentive: Rideshare Day Activities (Multi-Modal)  
(Description of incentive program)

We will hold an annual Rideshare Day Fair in conjunction with California Rideshare Week. This day will highlight the Rideshare Program. Informational brochures and exhibition booths will be made available to employees. Guest speakers will include high level postal employees supporting the program, as well as field experts from agencies who support rideshare efforts. Employees who have participated in the program by choosing alternate modes of transportation will be recognized with a "Certificate of Appreciation" presented by the highest management official at the site. All attendees will receive token rideshare gifts (keychains, pens, t-shirts, etc...).

How are you marketing this incentive to your employees?

Timing is everything. Employees need to know an event is coming-- and be constantly reminded of it as the event draws near. Two months before Rideshare Day, it will be mentioned in the newsletter. About a month before, posters will be hung around the site (in high traffic areas such as lunchrooms) and a bigger article will appear in the newsletter.

How much staff time per week will be required to develop and implement this incentive?

Eight hours will be used to promote this incentive.

How will the incentive be monitored and evaluated?

The ETC will monitor this incentive through the employee participation form and the pledge cards turned in by participating employees.

What Transportation Mode(s) are impacted by this incentive?

All modes.

## Participation

Current number of employees participating \_\_\_5\_\_\_

Projected number of employees participating \_\_\_71\_\_\_

This incentive will be implemented no later than 30 days after plan approval.

VI-1  
**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive ☒ X (Revised)      New Incentive ☐

Incentive: Emergency Ride Home (Multi-Modal)  
(Description of incentive program)

All employees who utilize alternate modes of transportation will be provided a ride home in case of a personal emergency or unscheduled overtime. The ride home will be provided by Yellow Cab or a Enterprise Rental Car. We anticipate only a 15 minute waiting period for the employee once the supervisor is notified of the employee's need. The supervisor will follow the established standard procedures and the employee is obligated to comply with the Emergency Ride Home Agreement (attached).

**How are you marketing this incentive to your employees?**

A flyer will be distributed outlining the basic points of the ERH program. These flyers will also be available at the Rideshare Day event. A newsletter article will also alert employees to the program's existence. When the USPS rideshare program brochure is developed, ERH will be mentioned in the text.

**How much staff time per week will be required to develop and implement this incentive?**

One hour per week. Additional hours will be used if needed.

**How will the incentive be monitored and evaluated?**

The ETC will monitor this incentive through the use of the employee participation form and Emergency Ride Home Agreement forms that have been signed by participating employees.

**What Transportation Mode(s) are impacted by this incentive?**

All modes.

**Participation**

Current number of employees participating     5    

Projected number of employees participating     AS NEEDED    

This incentive will be implemented no later than 0 days after plan approval.



**EMPLOYEE:** Read this form and sign at the bottom if you agree to its terms. It will be kept on file with the Employee Transportation Coordinator.

## **EMERGENCY RIDE HOME (ERH) AGREEMENT**

### **ELIGIBILITY**

As a participant in the local commuter program, you may be eligible for a ride home provided by the U.S. Postal Service. A voucher for a taxi cab or rental car will be provided for your use if:

- 1) you have an unplanned emergency that requires you to leave work early, or are required to work mandatory overtime, or are a member of a car/van pool whose driver is unable to take you home due to either an unplanned emergency or is required to work mandatory overtime; and
- 2) you are registered with the local commuter program; and
- 3) you are normally scheduled to start work between 6:00 am and 10:00 am; and
- 4) you either walked, bicycled, rode public transportation, or car/van pooled to work on the day of the emergency.

If you meet all of the above requirements and you need a ride home, the USPS will determine whether a taxi or rental car is appropriate. In general, if the estimated cost of a taxi to your destination is \$20.00 or less, a voucher not to exceed that amount will be provided for your use and a cab will be called to pick you up at your work site. Taxi expenses in excess of \$20.00 will be your responsibility.

However, if the estimated cost of a taxi to your destination is greater than \$20.00, a rental car will be delivered to your work site for your use for one day, unlimited mileage, with collision and comprehensive protection included. To qualify for a rental car, you must also be at least 21 years old and have a valid driver's license. You will be required to return the car to your work site by 9:00 am the following day. You will be responsible for all gasoline used, and any other expenses beyond what the USPS has provided. If you are not qualified to rent a car, you will be given the taxi voucher not to exceed \$20.00 regardless of the estimated taxi fare.

If two or more members of the same car/van pool require an emergency ride home, and at least one member is qualified to rent a car, they will all share a single rental car to their destinations.

### **USE**

This program is to be used in the event of an unplanned emergency or mandatory overtime. Improper use of this program will require you to reimburse the USPS for all expenses incurred. Inappropriate reasons for using this program include, but are not limited to: transportation for personal errands; pre-planned medical or other appointments; PTF's sent home early; or any overtime for those on the Overtime Desired Lists. The USPS reserves the right to determine when a particular set of circumstances is an emergency, and may require documentation. Use of this program is limited to four times per twelve month period for unplanned emergencies, and is unlimited for overtime situations. The ERH program may be terminated at any time without notice.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

# U.S. POSTAL SERVICE EMERGENCY RIDE HOME (ERH) VOUCHER # \_\_\_\_\_

NOTICE: This voucher is to be used only Monday through Friday (except Holidays) for eligible employees who are registered with the Commuter Program. The employee's supervisor is responsible for issuing this voucher. In the event this service is used incorrectly, the employee shall reimburse the USPS for all expenses incurred.

**A SUPERVISOR INSTRUCTIONS:** Call taxi company at ( \_\_\_\_ ) \_\_\_\_\_ to get an estimate of the taxi fare to employee's destination, including any intermediate stops. If the total fare is \$20.00 or less, then request a cab under the U.S. Postal Service Emergency Ride Home Program be sent to the employee's work site. Complete and sign Part B, items 1-5, and have the employee read and sign item 6. Give the employee the white and yellow copies, and send the pink copy to the Employee Transportation Coordinator.

If the estimated fare is greater than \$20.00, call the Rental Car company at ( \_\_\_\_ ) \_\_\_\_\_ and request a rental car under the U.S. Postal Service Emergency Ride Home Program be sent to the employee's work site. Have the employee complete and sign Part C, Items 1-6. You must complete and sign items 7-10. Give the employee the white and yellow copies, and send the pink copy to the Employee Transportation Coordinator.

NOTE: To qualify for a rental car, the employee must be at least 21 years of age and have a valid driver's license. He is also required to return the car to the work site the following day by 9:00 am. If he is not qualified to rent a car, provide him with the taxi voucher only.

**B TAXI VOUCHER** The value of this voucher shall not exceed \$20.00. Any expenses beyond that amount shall be the responsibility of the employee named below:  
*(Supervisor: complete and sign items 1-5.)*

1. Empl. Name: \_\_\_\_\_
2. Date: \_\_\_\_\_
3. Destination: \_\_\_\_\_
4. Est. Taxi Fare: \_\_\_\_\_
5. Authorized By: \_\_\_\_\_

*(Employee: Read and sign below.)*

I hereby certify that I am registered with the Commuter Program and am eligible for this service.

6. Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Charge To: U. S. Postal Service

Address: \_\_\_\_\_

City & ZIP: \_\_\_\_\_

## FOR TAXI DRIVER USE ONLY!

Driver Name: \_\_\_\_\_

Payroll #: \_\_\_\_\_

Cab #: \_\_\_\_\_

Total \$: \_\_\_\_\_ (Not to exceed \$20.00)

**C RENTAL CAR VOUCHER** This voucher is good for one overnight, unlimited mileage rental car with collision and comprehensive protection included. All gasoline, and any expenses beyond the above are the responsibility of the employee named below:

*(Employee: complete and sign items 1-6.)*

1. Empl. Name: \_\_\_\_\_
2. Social Sec. #: \_\_\_\_\_
3. Dr. Lic. #: \_\_\_\_\_
4. Date of Birth: \_\_\_\_\_
5. Home Ph. #: \_\_\_\_\_

Charge To: U. S. Postal Service  
Western Region Headquarters  
850 Cherry Avenue  
San Bruno, CA 94099-0000

*(Supervisor: complete and sign items 7-10.)*

7. Date: \_\_\_\_\_
8. Destination: \_\_\_\_\_
9. Est. Taxi Fare: \_\_\_\_\_
10. Authorized By: \_\_\_\_\_

I hereby certify that the above information is correct and I am registered with the Commuter Program and am eligible for this service.

6. Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate Incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive   X  

Incentive: Measure A Commuter Assistance Program  
Riverside County Residents Only  
(Description of incentive program)

All employees who live in Riverside County, and commute to work westbound on the 91 corridor who have not participated in ridesharing for the last 90 days will be eligible for the Riverside County Transportation Commission's (RCTC) "Survive the Drive", freeway commuter incentives. Interested employees who join a carpool (5 days a month), vanpool or buspool, or take public transit (10 days a month) must contact the Transportation Coordinator who will register the employee with RCTC. New 2 person carpools will be eligible for \$1.00/day and \$2.00/day for 3 or more person carpools for three months paid in Unocal Autoscrip. Existing Carpools will be eligible for \$50.00/month for the first new rider and \$25.00/month for 3 months for each additional new rider paid in Unocal Autoscrip, and VPSI will provide a \$200 credit toward the fourth month of operation when utilizing a VPSI van. Transit riders will be eligible for 50% off bus passes for new riders on the Inland Empire Connection (IEC149) for three months. Funding for this program is provided by RCTC.

How are you marketing this incentive to your employees?

USPS employees in Riverside County will be targeted to receive "Survive The Drive" information through a mailing to their homes.

How much staff time per week will be required to develop and implement this incentive?

One to two hours per week.

How will the incentive be monitored and evaluated?

Incentive will be monitored through use of employee participation form and Point Award Incentive.

What Transportation Mode(s) are impacted by this incentive?

Carpool

Participation

Current number of employees participating   0  

Projected number of employees participating   6  

This incentive will be implemented no later than 30 days after plan approval.

## Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate Incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive   X  

Incentive: Commuter Discount Cards (Multi-Modal)  
(Description of incentive program)

Employees who use an alternate transportation mode other than SOV at least one day a week will be eligible to receive the Commuter Discount Card provided by RTD. The commuters will get discounts ranging in value from 6% to 75% at 117 downtown retailers; such as, ARCO Plaza, the Westin Bonaventure, Olvera Street shops, Seventh Market Place, Broadway Plaza and other retailers in the downtown Los Angeles area by presenting a commuter card showing they rideshare. The eligible employees will receive the Commuter Discount Cards from the Transportation Coordinator. This discount card will be made available only to registered USPS rideshare program participants who are helping clean the air by using an alternate transportation mode.

How are you marketing this incentive to your employees?

We will approach RTD about the possibility of obtaining Commuter Discount Card literature for a home mailing to all USPS employees working in the downtown L.A. area. A newsletter article will explain the Commuter Discount program and state the cards may be obtained through the ETC.

How much staff time per week will be required to develop and implement this incentive?

One to two hours per week.

How will the incentive be monitored and evaluated?

This incentive will be monitored through the use of the employee participation forms and the register that will be kept by the ETC.

What Transportation Mode(s) are impacted by this incentive?

All modes.

Participation

Current number of employees participating     0    

Projected number of employees participating   10  

This incentive will be implemented no later than 30 days after plan approval.

# Drive Less.

# Buy More.



**Do you rideshare at least one day a week?**

You are eligible for the Commuter Discount (CD) card.

**Do you want discounts from Downtown merchants?**

Use your CD card.

**Why is it special?**

Because it is available only to those who are helping clean the air and reduce traffic congestion.

**How do you know which retailers are participating?**

This brochure lists the retailers taking part in the program. And you can look for merchants displaying the CD symbol or contact your employee transportation coordinator.

**How do you obtain the CD card if you rideshare once a week?**

Contact your employee transportation coordinator.

**You'll find Commuter Discounts at these Downtown retailers:**

#### ARCO PLAZA

The Barber Shop	10%
Beauty Institut	20%
Hair products, facials, nails, manicures & pedicures	
Downtown Family Fitness Centers	Call Mia. One week free trial membership & 60% off enrollment, validated parking up to 2 hr
Duttons Books	10%
Golden Plaza Cleaners	15%
Mothers Work Maternity	10% (non-sales)
Mrs. Fields Cookies	Free 20 oz. soda w/purchase of 3 or more cookie
PIP Printing	10%
Plaza Footcare	10% selected products & free exam
505 Plaza Pharmacy	\$2.00 new prescription
Rocky Mountain Chocolate Factory	50%
Caramel apples, dipped strawberries & raspberries	
Seymour's Jewelers	70% all sterling silver rings
St. Bernadine's Catholic Chapel Bookstore	50% selected items
Wilshire Metro Realty	\$500.00 escrow fees

#### BONAVENTURE SHOPPING GALLERY

Artstar	10%
August Moon	30%
Captain Lee's Seafood	10%
Cozzoli's Pizza	10%
Gourmet Cafeteria	10%
Health Winner	10%
Jindo Furs	\$100 off purchase over \$1,000
Liveland	20%
P.T.S. Limo Service	10%
The Shirtyery	20% non-sale items
Subway	\$1.50 off 6" sub, \$1.00 off foot-long
Wolf's European Hair Design	10%

continued ►

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive   X  

New Incentive       

Incentive: Preferential Parking  
(Description of incentive program)

Preferential parking spaces will be assigned to those employees who participate in the rideshare/vanpool programs. Preferential parking spaces will be identified by (reserved - Carpool signs). Interested employees must register with the Transportation Coordinator. We will initially have 3 preferential parking spaces. Additional spaces will be added as needed to accommodate increased participation in the rideshare programs.

**How are you marketing this incentive to your employees?**

Carpool and vanpool literature will mention this incentive. A flyer and/or bulletin will be sent out when new or additional spaces are added ("Due to popular demand.."). This incentive will be covered in the USPS brochure as available per site agreement.

**How much staff time per week will be required to develop and implement this incentive?**

One to two hours per week.

**How will the incentive be monitored and evaluated?**

This incentive will be monitored through use of the carpool registration log.

**What Transportation Mode(s) are impacted by this incentive?**

Carpool and Vanpool

**Participation**

Current number of employees participating   2  

Projected number of employees participating   6  

This incentive will be implemented no later than 0 days after plan approval.

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive   X   (Revised)      New Incentive       

Incentive: Transit  
(Description of incentive program)

Bus schedules and maps will be posted at the Employee Information Center. Personalized bus routing assistance will be provided by the Transportation Coordinator. Information Clinics will be presented to targeted employees on new transit mode such as Commuter Rail lines, Dial a Ride, etc. Employees who commute to work by transit will be eligible for the monthly point system awards (refer to Point Award Incentive). The Culver City Municipal Bus Line will be contacted about building a bus shelter on the bus stops located on the North and South sides of Sepulveda Blvd at Janisann Ave.

**How are you marketing this incentive to your employees?**

We will approach local transit authorities and suggest targeted mailings to USPS employees along certain routes. If they can provide the printed materials, we can conduct the direct mailings. In addition, information centers (see Marketing Outline) will carry literature on routes near the site. The availability of the RTD Commuter Travel Plan service will be promoted through transit flyers and newsletter articles within RTD's area.

**How much staff time per week will be required to develop and implement this incentive?**

One to two hours per week.

**How will the incentive be monitored and evaluated?**

This incentive will be monitored through the use of the employee participation form and ETC will check the bus stop to see if improvements have been implemented.

**What Transportation Mode(s) are impacted by this incentive?**

Public transit.

**Participation**

Current number of employees participating       1      

Projected number of employees participating       2      

This incentive will be implemented no later than 30 days after plan approval.

# Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_ New Incentive \_\_X\_\_

Incentive: New Employee/Employee Transfer Orientation  
(Multi-Modal)  
(Description of incentive program)

When new employees or employee transfers start working at the site an orientation about the Rideshare Program will be conducted by the Transportation Coordinator. The new employees will be asked to complete a commuter survey form to receive a Computerized matchlist within one month of beginning work at the site.

How are you marketing this incentive to your employees?

We will work with Human Resources to obtain lists of new employees/transfers. The ETC will then follow-up with a letter to those names on the list, inviting them to a rideshare orientation session.

How much staff time per week will be required to develop and implement this incentive?

One to two hours per week.

How will the incentive be monitored and evaluated?

This incentive will be monitored through the Personnel Office.

What Transportation Mode(s) are impacted by this incentive?

All Modes.

## Participation

Current number of employees participating \_\_\_0\_\_\_

Projected number of employees participating \_\_\_10\_\_\_

This incentive will be implemented no later than 30 days after plan approval.



**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive       

New Incentive \_\_X\_\_

Incentive: Newsletter - "The Postal Pedal'r"  
(Description of incentive program)

A quarterly newsletter titled "The Postal Pedal'r" will be distributed to all employees. This newsletter will feature current incentives, promotions and feature articles on the benefits of using alternate commute modes of transportation. The newsletter will enable us to promote our rideshare program by getting employees directly involved by featuring employees and their family members enjoying a bike ride, leisurely walk, etc. All employees will be invited to share talents, thoughts, and enthusiasm.

**How are you marketing this incentive to your employees?**

An initial flyer will be sent around inviting interested employees to join in the planning of our newsletter. Posters will be hung around the office site (in high traffic areas). Discussions and stand-ups announcing the upcoming newsletter will be given to all employees.

**How much staff time per week will be required to develop and implement this incentive?**

Eight to sixteen hours per week has been allotted for implementation of Regulation XV.

**How will the incentive be monitored and evaluated?**

Increased participation in alternate commute modes will be used to evaluate effectiveness. Periodic survey will be taken to find out what employees want to see in the newsletter.

**What Transportation Mode(s) are impacted by this incentive?**

All modes

**Participation**

Current number of employees participating     0    

Projected number of employees participating    20   

This incentive will be implemented no later than 30 days after plan approval.

# Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive \_\_X\_\_

Incentive: Vanpool

(Description of incentive program)

We have targeted 2% of our 6-10 a.m. employee population as being potential vanpool participants based on information provided by our density map. An aggressive information outreach campaign will be conducted to help employees with vanpool formation. Employees who reside in vanpool cluster areas will be sent personal letters by the Transportation coordinator inviting them to vanpool information clinics. Vanpool vendors will be asked to come to the site and make themselves available for questions dealing with leasing options to interested employees. Divisional Transportation Coordinators will coordinate interested vanpoolers as identified by the site Transportation Coordinator for multi-site vanpool formation. All vanpool owners will receive a (insert value) gift certificate upon formation of the vanpool. All vanpool riders will receive a token gift of their choice (t-shirts, caps, coffee mugs) after riding with the vanpool for three months. All participants in this program will be eligible for the monthly point system awards (refer to Point Award Incentive).

How are you marketing this incentive to your employees?

A month-long campaign devoted to vanpooling will be conducted (see Marketing Outline). Prior to "Vanpool Month", a feature article or special edition of the newsletter will outline the coming month's vanpool activities. Stand up talks will also be utilized to inform employees of these activities. Density maps will be utilized to target pockets of potential vanpoolers. These targeted employees will receive an invitation to attend a "Vanpool Party". Invitations will either be sent through a home mailing or distributed to individuals at work. Flyers will announce the party schedule, inviting employees along proposed routes to attend as well. The "parties" will be held towards the beginning of Vanpool Month. Towards the end of the month, the campaign will come to a rousing conclusion with a lunchtime "vanpool clinic". This will give employees, who have formulated groups, a chance to find out about the next step. Of course, vanpool literature and information will be available through the ETC (and the designated information center, per Marketing Outline) throughout the year.

How much staff time per week will be required to develop and implement this incentive?

Eight to ten hours will be initially use to get the vanpool set up and 3 to 4 hours per week will be allocated for maintenance.

How will the incentive be monitored and evaluated?

This incentive will be monitored through the employee participation form and logs that will be kept by the ETC to register riders in the vanpool.

What Transportation Mode(s) are impacted by this incentive?

Vanpool

Participation

Current number of employees participating \_\_\_0\_\_\_

Projected number of employees participating \_\_\_ 2 \_\_\_

This incentive will be implemented no later than 30 days after plan approval.

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive \_\_X\_\_

Incentive: "Back to Summer Kickoff"  
(Description of incentive program)

On Friday April 10 the USPS will welcome summers return and the return of longer daylight hours with a celebration. We will serve refreshments, feature a guest speaker and announce a contest that should encourage further participation in the walking and bicycling modes of commute. Any employee that registers with the ETC, walks or rides a bike to work at least three days a week for six weeks between June 1 and July 31 will receive a pair of tennis shoes (not to exceed \$50.00). A fifty dollar gift certificate from the sporting goods store of the employees choice will be awarded. All walkers and bike riders will also be eligible for the monthly point system awards (refer to Point Award Incentive).

**How are you marketing this incentive to your employees?**

Two weeks before the scheduled event, paycheck stuffers will go out to all employees. This will be reinforced through flyer distribution up until "kickoff".

**How much staff time per week will be required to develop and implement this incentive?**

Eight hours will be allotted to purchase refreshments, contact a potential speaker and purchase gift certificates.

**How will the incentive be monitored and evaluated?**

Incentive will be monitored by the number of employees that register with the ETC. Employee participation forms will also be used to evaluate success.

**What Transportation Mode(s) are impacted by this incentive?**

Walking and Bicycling

**Participation**

Current number of employees participating \_\_\_\_\_0\_\_\_\_\_

Projected number of employees participating \_\_\_\_\_6\_\_\_\_\_

This incentive will be implemented no later than 30 days after plan approval..

# Incentive Description

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_X\_\_ (Revised)      New Incentive \_\_\_\_\_

Incentive: Carpool  
(Description of incentive program)

All interested employees will receive a computerized matchlist provided by CTS. Matchlist populations were expanded during this year's survey process to include surrounding employers. In last year's plan, only USPS employees were listed on the matchlist. This expanded population should increase the number of potential carpoolers. Personalized matching assistance from the Transportation Coordinator will be given to interested employees in a timely manner after the employee gets their computerized matchlist. Air pumps and a tire gauge will be made available to all carpoolers needing air for low tires. To encourage a larger number of carpools, the first group of employees willing to try a carpool with 3 persons will be eligible to receive a gift certificate for \$10.00 after 2 months of carpooling. All carpoolers will be eligible for the monthly point system awards (refer to Point Award Incentive).

How are you marketing this incentive to your employees?

A newsletter article will feature a happy 3 or 4 person carpool. The gift certificate incentive will be mentioned in this article. A flyer will be distributed to remind employees of matching services and to remind them to keep their matching profile current. The matching service and some basic "rules of carpooling" will be included in the USPS rideshare program brochure.

How much staff time per week will be required to develop and implement this incentive?

One to two hours per week.

How will the incentive be monitored and evaluated?

This incentive will be monitored through use of the employee participation form and the log kept by the ETC.

What Transportation Mode(s) are impacted by this incentive?

Carpool

Participation

Current number of employees participating \_\_\_3\_\_\_

Projected number of employees participating \_\_\_19\_\_\_

This incentive will be implemented no later than 30 days after plan approval.

**Incentive Description**

Section VI must be completed by employers filing both new and annual update plans (see instructions on page 32)

Please use a separate incentive Description Form for each incentive.

Current Incentive \_\_\_\_\_

New Incentive \_\_X\_\_

Incentive: Rideshare Library (Multi-Modal)  
(Description of incentive program)

All USPS employees will have access to a library of rideshare periodicals made available at each site by the ETC. We will subscribe to publications such as California Bicyclist, Southwest Cycling, etc...and keep copies of ACT and CTS literature on hand. Other materials may include such items as brochures detailing the effects of air pollution, "100 Ways to Save the Earth" booklets, and bicycle trail/transit maps. All items will be available for employees to check out. If a particular item is well stocked, the employee may keep it.

**How are you marketing this incentive to your employees?**

Once the library is set up at a site, a flyer will announce its location and times of operation. It would make good marketing sense to tie the library in with the information center (as described in the Marketing Outline). The rideshare library will be mentioned in the USPS rideshare program brochure.

**How much staff time per week will be required to develop and implement this incentive?**

Four to five hours to implement this incentive and one to two hours per week to maintain.

**How will the incentive be monitored and evaluated?**

This incentive will be monitored through the use of checkout sheets and will be available to all employees.

**What Transportation Mode(s) are impacted by this incentive?**

All modes

**Participation**

Current number of employees participating \_\_\_\_0\_\_\_\_

Projected number of employees participating \_\_\_\_20\_\_\_\_

This incentive will be implemented no later than 30 days after plan approval.

## USPS RIDESHARE MARKETING OUTLINE

OBJECTIVE 1: Reach USPS employee base; create awareness of rideshare program.

**Task 1:** Establish program identity. Determine the following : a) program name, b) logo, c) tag line (e.g. "Rideshare for Cleaner Air").

**Task 2:** Develop awareness through marketing strategies. (Ask where/how do employees get information. Key questions when designing any marketing tool: What do you want them to know? What action do you want them to take?)

### Awareness Strategies (Short-Term)

- \* Present the program at stand up discussions.
- \* Invite new hires/transfers to rideshare orientation meeting held by ETC.
- \* Plan campaigns (see Objective 3) promoting the program as a whole.

### Educational Strategies (Long-Term)

- \* Produce newsletter on a regular basis (or get a running column in an existing USPS newsletter).
- \* Create a brochure/packet which outlines the USPS rideshare program.
- \* Design a "generic" USPS rideshare poster to include basic information (i.e. ETC location and phone number); post at strategic site locations.
- \* Develop "information centers"-- at smaller sites, this may be a bulletin board dedicated to rideshare information; at bigger sites, an entire display may be in order.
- \* Produce USPS rideshare video.

**Task 3:** Create interest by promoting general program incentives (e.g. point award, Emergency Ride Home) as *exclusive* to ridesharers only.

OBJECTIVE 2: Reach mode-specific (e.g. walking, biking) target group.

**Task 1:** Identify size of potential participants in mode, based on survey results.

**Task 2:** Tailor or "package" incentive to site and its target group. (How can I implement this incentive so it will be most attractive to the employees I'm trying to reach?)

**Task 3:** Create/select a marketing strategy (or strategies) that educate the targeted employees about the incentive.

#### Promotional Strategies (Short-Term)

- \* Distribute flyers introducing new incentive or reminding employees about existing ones.
- \* Feature incentive in newsletter.
- \* Design special poster around incentive and/or its related mode.
- \* Feature incentive in stand up talks.
- \* Send home mailings to selected zip code areas (vanpool/transit).

#### Educational Strategies (Long-Term)

- \* Create brochure with section on mode; include in packet with other materials related to mode topic.
- \* Dedicate bulletin board or panel on a rideshare display to a specific mode.
- \* Locate "experts" using mode within employee group; list names as contacts for those interested in a particular mode-- testimonials generate good word of mouth.

**OBJECTIVE 3:** Plan effective marketing campaigns.

**Task 1:** Evaluate each site. Decide on the best mix of general program awareness campaigns vs. mode-specific campaigns. (Ask: Do the employees at the site know about the program and are aware of its components? Is there a specific mode that needs a big "push" in order to attain AVR targets?)

**Task 2:** Determine how many campaigns a site can realistically do in a year and the best time to do them. (Assume the average campaign is one month. At least one "general" campaign should be built around Rideshare Week at the end of September.)

**Task 3:** Set a measurable goal for the campaign. (For example: "We will sign up 10 more people in the bike club"). Evaluate what worked and what didn't.

#### Types of Campaigns

*Informational Campaigns:* Usually are developed around a theme and/or a slogan. Normal marketing channels feature a particular topic for a given amount of time.



Suggested campaign-- "Get The Point(s)" campaign to introduce point award incentive. Utilize posters, flyers, newsletter articles, paycheck stuffers (if there is a tie-in with the points and paychecks), and stand up presentations. Use posters and flyers to trigger interest. Use stand ups and newsletters to explain point structure and participation rules.

*Events:* Range from quarterly breakfasts to annual rideshare faires. Events require a big promotional build up to ensure participation on the day(s) of the event. Plan early.

Suggested event (small scale)-- "Meet Your Match" meetings to encourage vanpooling and carpooling. Target employees in certain cities/zip codes. Arrange to have invitations sent to employees' homes in selected area. Distribute a flyer at work and/or announce upcoming meetings in the newsletter. If you have food, they will come...

Suggested event (large scale)-- "Rideshare Day" event to increase overall program awareness. Invite rideshare related vendors (eg. Commuter Computer, RTD) to the site during lunch. Have information tables and vehicles on display. Offer free drinks and a giveaway item, such as a cup, to all attendees. Ask the Postmaster to speak. Register new ridesharers! *Note:* Start promoting the event early by mentioning it in the newsletter 2-3 months before. As the date gets closer, remind the employees through posters, flyers, and paycheck stuffers.

*Contests:* Create awareness/interest during the course of the contest. Some entry forms can be used to collect additional information from employees.

Suggested contest-- "Children's Poster Contest" to increase awareness of air pollution and its effect on its effect on the next generation. Children of USPS employees will be eligible to enter a poster contest. By suggesting ways that people can clean up the air, they can win a ribbon. Posters will be displayed at local post offices. Promote contest through newsletters and flyers.

*Combination:* Any of these types can be combined. For example, you might collect contest entries or announce a winner at an event.

Suggested "combination" campaign-- "May is Vanpool Month" to encourage new vanpool formation. In May (or whatever month you choose), conduct an informational campaign featuring vanpool information in the newsletter, in stand up talks, etc... At the beginning of the month, hold zip code meetings (density maps may indicate pockets of potential vanpoolers). Towards the end of the month, follow-up with a lunchtime "vanpool clinic" with various vanpool vendors.

## Incentive Summary

Section VI must be completed by employers filing both new and annual update plans

Summarize your incentives:

Incentive	Employees Participating		Implementation Schedule (Days) from form VI-1
	Current	Projected	
BICYCLING	0	3	30
MANAGER & SUPERVISOR SUPPORT	0	10	30
POINT AWARD	0	40	30
FLEXIBLE SCHEDULE	0	3	30
RIDESHARE DAY ACTIVITIES	5	71	30
EMERGENCY RIDE HOME	5	As NECESSARY	0
RIVERSIDE (COMMUTER)	0	6	30
COMMUTER DISCOUNT CARDS	0	10	30
PREFERENTIAL PARKING	2	6	0
TRANSIT	1	2	30
NEW EMPLOYEE ORIENTATION	0	10	30
NEWSLETTER	0	20	30
VANPOOL	0	2	30
BACK TO SUMMER KICK-OFF	0	6	30
* CARPOOL	3	19	30
RIDESHARE LIBRARY	0	20	30
* Projected			
1 - 3 person carpool			
8 - 2 person carpool			

## Emergency Episode Plan

*Section VII must be completed by employers filing new and updated plans. (see instructions on page 33)*

**Do you have the following? (Employers answer the following questions)**

Radio to receive broadcasts Yes \_\_\_\_\_ No X

Log to record broadcast information Yes X No \_\_\_\_\_

Signs to inform employees of alerts Yes X No \_\_\_\_\_

How many fleet vehicles does your company own/operate at this site? 38  
(Do not leave blank)

**What actions does your organization take to reduce fleet vehicle use and reduce employee vehicle trips during a Stage 2 smog alert?**

(see attached)

**What actions does your organization take to reduce fleet vehicle use and reduce employee vehicle trips during a Stage 3 smog alert?**

The United States Postal Service operates a 24 hour a day, 365 days a year (including national holidays) network. Listed actions eliminate use of all vehicular activities not necessary for basic operations.

(see attached)

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
COMPUTER PROGRAM TRIP REDUCTION PLAN  
EMERGENCY EPISODE PLAN

5

You must have the following:

Radio to receive broadcasts  
Log to record broadcast information  
Signs to inform employees of alerts

Yes      No


---

What actions does your organization take to reduce fleet vehicle use and reduce operations during a Stage 2 smog alert?

1. Stop driver training/licensing activity.
2. Eliminate non-supervisory use of administrative vehicles.
3. Prevent non-essential shipments of GPMCs, OTRs, and other "rolling stock" containers.
4. Eliminate non-urgent shipment of trays/sacks and other "passive" empty containers.
5. Employees are encouraged to form carpools or use mass transit for their work commutes.
6. SEE ATTACHED

---

What actions does your organization take to reduce fleet vehicle use and reduce operations during a Stage 3 smog alert?

1. Same actions as described above for Stage 2 responses.
2. Stop street supervision/observation activities.
3. Restrain urgent, but "non-time sensitive" draying activities to appropriate time(s) of day.
4. Curtail road testing vehicles (associated with vehicle maintenance activities).
5. SEE ATTACHED

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
9150 Flair Drive  
El Monte, CA 91731

**EXEMPTION REQUEST From RULE 707 \***  
(REG. XV Section VII: Emergency Episode Plan)

COMPANY NAME: UNITED STATES POSTAL SERVICE/ CULVER CITY ID# 078674

ADDRESS: 11111 JEFFERSON BLVD

(Street)

CULVER CITY, CA 90230-9998

(City, ZIP)

CATHERINE BREWSTER  
~~BINDA THOMPSON~~

Catherine Brewster

PRINT YOUR NAME

Signature

JAN 24, 19  
Date

**Section I. REASONS FOR EXEMPTION REQUEST:**

COMPANY IS A MEMBER OF TMA/TMO WITH SCAQMD APPROVAL  
TO ADMINISTER AN EPISODE ALERT NETWORK \*\*

IMPEDIMENTS TO RADIO RECEPTION REQUIRE ALTERNATIVE  
MEANS OF RECEIVING EPISODE PREDICTION

X OTHER: This site has a standard office procedure to call in and  
obtain daily smog alerts. The alerts are then logged-in  
and smog stage alert signs are posted.

**Section II. LOCATION OF PREDICTION LOG:**

PREDICTION IS LOCATED IN THE OFFICE OF THE ETC (BULK MAIL ACCEPT

**Section III. TMA/TMO INFORMATION:**

TMA/TMO NAME: N.A. PHONE #:

ADDRESS:

(Street)

(City, ZIP)

\* This form must be attached to TRP in Section VII.

\*\* Complete Section III.

## Appendix A- Vanpool Operations

## NUMBER OF VANS OPERATED

**Company owned**

**Vendor owned/leased**

**Owned by employees**

**This report covers the following period:**

month(s)    year(s)

**DAYS OF OPERATION**

Total number of days operated

Number of days not operated because:

**No work scheduled**

**Due to strikes**

### Official emergencies

**Other reasons**

Vehicle mileage statistics of reporting period, above

Total miles of vanpool use

Total miles of personal use

### Vehicle hour statistics

Total vehicle use hours

**Vanpool use hours**

[illegible]

**Describe the methods used to collect this data on a separate sheet and where the data is kept**

## Appendix A- Buspool Operations

## NUMBER OF BUSES OPERATED

**Company owned**

**Vendor owned/leased**

**Owned by employees**

**This report covers the following period:**

**month(s)    year(s)**

[illegible]

**Describe the methods used to collect this data on a separate sheet and where the data is kept**

page 2

## Appendix B - Clean Fuels Credit Worksheet

Listed below are the credits given for commute use of clean fueled vehicles: (see example on page 39)

<b>Fuel</b>	<b>Credit</b>
Liquid Petroleum Gas (LPG)	2:1
Methanol	3:1
Compressed Natural Gas (CNG)	4:1
Electric (E.V.)	5:1

### Calculation

Total # of vehicles used for commuting to work  
(Transfer "S" from Form IV-3) \_\_\_\_\_ **A**

Total number of clean fuel vehicles used for commuting  
from home to work per day \_\_\_\_\_ **B**

Total number of clean fuel vehicles used for commuting  
from home to work per 5 days (Multiply B by 5) \_\_\_\_\_ **C**

Base # of vehicles used for commuting to work (A minus C) \_\_\_\_\_ **D**

Distribute the clean fuel vehicles from B into the applicable  
categories below (Column I) and divide by the appropriate  
factor and enter the results in Column II

	<b>Column I</b>		<b>Column II</b>	
LPG Vehicles	<u>      /2      </u>	=	<u>                    </u>	<b>(1)</b>
Methanol	<u>      /3      </u>	=	<u>                    </u>	<b>(2)</b>
CNG Vehicles	<u>      /4      </u>	=	<u>                    </u>	<b>(3)</b>
Electric Vehicles	<u>      /5      </u>	=	<u>                    </u>	<b>(4)</b>

Total Clean Fuel Vehicles per day, Add Column I I (1)  
through (4) \_\_\_\_\_ **E**

Total Clean Fuel Vehicles per 5 days - Multiply E by 5 \_\_\_\_\_ **F**

Adjusted total vehicles used for commuting to work (D + F) \_\_\_\_\_ **G**

Transfer G to line T (Total Vehicles) on Form IV-3, Page 15.



The USPS Operations Support Section will provide this information to the SCAQMD.

## Appendix C - Truck Operations

The purpose of this appendix is to determine truck traffic patterns. Please complete this survey if your company receives or delivers goods utilizing large trucks or *owns* or *leases* large trucks. *Have the person within your organization most knowledgeable with the shipping, receiving and transportation of goods complete this appendix.* Please carefully review both sides of this form and complete only those sections of the survey that apply to your business. *Please print or type.*

Company Name \_\_\_\_\_ Zip Code \_\_\_\_\_

I.D. # \_\_\_\_\_

### Section I - Business information

Please provide the following information

1. Classify your business using the Standard Industrial Classification Codes Listing provided. If more than one category applies to your business, select the classification that reflects the majority of your business activities.

SIC Code: \_\_\_\_\_

2. List the total square footage of your work site. (Include all buildings) \_\_\_\_\_

3. Does your site have a loading dock? Yes \_\_\_\_\_ No \_\_\_\_\_

4. During what hours does your business normally operate? From \_\_\_\_\_ To \_\_\_\_\_

5. Do you prohibit shipments during certain hours? Yes \_\_\_\_\_ No \_\_\_\_\_

6. How many employees do you have at this site? \_\_\_\_\_

7. How many work sites that ship or receive goods does your company have in the South Coast Air Basin? \_\_\_\_\_

### Company Contact Person

Provide the following information for the person you wish to designate as your company contact regarding this survey or future SCAQMD inquiries about truck operations. *Please print or type.*

Name \_\_\_\_\_ Title \_\_\_\_\_ Phone (\_\_\_\_) \_\_\_\_\_

### Section II - Shipments Received

Please log the shipments you receive over the next week. Tabulate the information requested in the chart below on a separate sheet of paper, and then record the totals in the chart (Only record Monday - Friday shipments received). Only record shipments by trucks similar to those depicted in the diagrams on the *next page*.

TIME PERIOD	TRUCK TYPE	• FULL LOADS - FTL	• PARTIAL LOADS - LTL	• RECEIVED BY YOUR TRUCKS	SPECIAL INSTRUCTIONS
12 am - 5:59 am	Type A				For each truck type in each time period indicate:
	Type B				
6 am - 8:59 am	Type A				1. How many shipments were full truck loads (FTL). FTL's are shipments that are delivered to a single location and generally exceed 10,000 lbs.
	Type B				
9 am - 10:59 am	Type A				2. How many shipments were partial loads (LTL). LTL's are shipments to various businesses, combined on the same truck, and given to various locations.
	Type B				
11 am - 12:59 pm	Type A				3. How many shipments are made using company owned trucks. Do not include "For - Hire" carriers - commercial or private carriers that are not owned by your company or corporation.
	Type B				
1 pm - 3:59 pm	Type A				
	Type B				
4 pm - 6:59 pm	Type A				
	Type B				
7 pm - 11:59 pm	Type A				
	Type B				

### Section III - Shipments sent

Please log the shipments you make over the next week, tabulate the information requested in the chart below on a separate sheet of paper, and then record the totals in the chart (Only record Monday - Friday shipments sent). Only record shipments by trucks similar to those depicted in the diagrams at the *bottom of this page*.

TIME PERIOD	TRUCK TYPE	# FULL LOADS-FTL	# PARTIAL LOADS-LTL	# SENT BY YOUR TRUCKS	SPECIAL INSTRUCTIONS
12am-5:59am	Type A				<b>For each truck type in each time period indicate:</b>  1. How many shipments were full truck loads (FTL). FTL's are shipments that are delivered to a single location and generally exceed 10,000 lbs.  2. How many shipments were partial loads (LTL). LTL's are shipments to various businesses, combined on the same truck, and taken to various locations.  3. How many shipments are made using company owned trucks. Do not include "For - Hire" carriers - commercial or private carriers that are not owned by your company or corporation.
	Type B				
6am-8:59am	Type A				
	Type B				
9am-10:59am	Type A				
	Type B				
11am-12:59pm	Type A				
	Type B				
1pm-3:59pm	Type A				
	Type B				
4pm-6:59pm	Type A				
	Type B				
7pm-11:59pm	Type A				
	Type B				

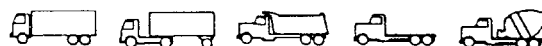
### Section IV - Truck Operations

This section should be completed only if your company owns or leases trucks. Again, use the diagrams below to determine the truck type (Type A or B). Please indicate: **1.** how many trucks your company owns in each truck type; **2.** how many trucks your company leases and operates in each truck type; **3.** how many trucks of your *total fleet* are used to ship goods within or through the South Coast Air Basin.

TRUCK TYPES OPERATED	# OF TRUCKS OWNED	# OF TRUCKS LEASED	# OF TRUCKS USED TO SHIP GOODS
Type A Trucks			
Type B Trucks			

#### Truck Type Diagrams

Use the truck diagrams below to determine which shipments made by trucks should be recorded on this appendix. Include only shipments which are made by trucks comparable to those depicted in the diagrams.



**Type A Trucks:** Road tractors, truck tractors (semi), or any truck with 3 axels or more



**Type B Trucks:** Large 2 axle trucks. Does not include step vans, passenger size vans, or pick - up trucks.

## Appendix D Compliance Form

N/A

**City of Los Angeles Transit Subsidy Ordinance (No. 164,483)**

Company name \_\_\_\_\_ SCAQMD Worksite ID# \_\_\_\_\_

Number of employees \_\_\_\_\_

Worksite address \_\_\_\_\_

**Number****Street****Zip Code****1. Who is responsible for administering your transit subsidy program?**

Name \_\_\_\_\_ Title \_\_\_\_\_

Department \_\_\_\_\_

Office Address \_\_\_\_\_ Phone \_\_\_\_\_

**2. How do you promote/advertise your transit subsidy program to your employees? (Check all that apply)**

\_\_\_\_\_ Employees sign up to receive the subsidy

\_\_\_\_\_ Discounted transit passes/coupons are provided to eligible employees at the employment site through:

\_\_\_\_\_ Payroll deduction \_\_\_\_\_ Direct payment by employee

\_\_\_\_\_ Transit passes/coupons are not sold to employees at the employment site

\_\_\_\_\_ Employees receive the subsidy through:

\_\_\_\_\_ Payroll supplement \_\_\_\_\_ Voucher, check, transportation allowance

\_\_\_\_\_ Reimbursement upon proof of purchase \_\_\_\_\_ Other

**3. How do you promote the transit subsidy program to your employees? (Check all that apply)**

\_\_\_\_\_ Company newsletter \_\_\_\_\_ Bulletin boards

\_\_\_\_\_ Corporate memo to employees \_\_\_\_\_ New hired employee orientation

\_\_\_\_\_ Other \_\_\_\_\_

**4. How many employees currently use transit to get to work? \_\_\_\_\_ employees \_\_\_\_\_ % of total employment****5. How many employees receive the transit subsidy each month? \_\_\_\_\_ employees \_\_\_\_\_ % of total employment****6. How many employees do you anticipate will receive the transit subsidy during the coming year?**

\_\_\_\_\_ employees \_\_\_\_\_ % of total employment

**Please Sign and Date the Following Statement**

I understand that my company is responsible for keeping records of transit subsidies offered and paid to employees commuting by public transit, and that the City of Los Angeles Department of Transportation staff may audit those records at any time.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Mail a copy of the completed form Appendix D to the following address:

**Department of Transportation, Transit Subsidy Ordinance,  
Room 1600, City Hall, 200 N. Spring Street, Los Angeles, CA 90012**

## Appendix D-I Exemption Request Form

**City of Los Angeles Transit Subsidy Ordinance (No. 164,483)**

### **Please Complete This Form**

Mail a copy of the completed form (Appendix D-1) to the following address:

**Department of Transportation  
Transit Subsidy Ordinance  
Room 1600, City Hall  
200 N. Spring Street  
Los Angeles, CA 90012**

You will be contacted if additional information is needed to substantiate your statements. An exemption letter will be mailed to you if your request is approved

Company United States Postal/ Culver City SCAQMD Worksite ID# 078674

Contact Person Name and title Catherine Brewster/ Employee Transportation Coordinator

Worksite address 11111 Jefferson Blvd. Culver City, Ca 90230-9998

Phone Number (310) 391-6374

I am requesting an exemption from complying with the provisions of the Transit Subsidy Ordinance for the following reasons:

XX The worksite is located within one of the ZIP codes listed above but is not located within the City of Los Angeles

       I am not providing free or subsidized parking to any of my employees

       I am providing free or subsidized parking only to my employees who carpool and/or vanpool

Signature Catherine Brewster Date 1/24/92

CLEAN AIR ACT/AIR QUALITY MANAGEMENT  
TRACKING FORMAT  
Revised 1/9/92

PROVIDE THE REGIONAL DIRECTOR, FINANCE WITH A COPY OF THE  
FOLLOWING INFORMATION BY COB OF THE THIRD MONDAY EACH AP:

DIVISION \_\_\_\_\_

AP \_\_\_\_\_ FY \_\_\_\_\_

Prepared by \_\_\_\_\_ PEN \_\_\_\_\_

ITEM	AP COST	YTD COST
AQMD PLAN FILING FEE	_____	_____
TRANSPORTATION COORD. TRAINING	_____	_____
SUPPLIES & EQUIPMENT	_____	_____
INCENTIVE PROGRAMS:		
MANDATED	_____	_____
PROMOTIONAL	_____	_____
OTHER (EXPLAIN)	_____	_____
TOTAL	_____	_____

ITEM	AP WKHRS	YTD WKHRS
TRANSPORTATION COORD. ACTIVITY	_____	_____
EMPLOYEE SURVEY ACTIVITY	_____	_____
INCENTIVE PROGRAMS:		
MANDATED	_____	_____
PROMOTIONAL	_____	_____
OTHER (EXPLAIN)	_____	_____
TOTAL	_____	_____

