

Redesignation Request & Maintenance Plan for the 2008 Ozone NAAQS

Background

The Washington region attained the 2008 ozone NAAQS (75 ppb) based on the design value for the period 2013-2015. The region's design value for the above NAAQS is 70 ppb, which is below the standard. Once the region has attained the standard, it can submit a request to redesignate the region to attainment/maintenance for the above standard. The redesignation request has to be accompanied by a maintenance plan, which demonstrates how the region will maintain its compliance with the standard in future.

Advantages of an approved maintenance plan for the 2008 ozone NAAQS

1. Provides closure to the implementation process for the standard.
2. The region covers all legal requirements such as, anti-backsliding requirements (Clean Air Act Section 110 (a)) related to that standard.
3. The maintenance plan will allow the region to develop revised MOVES2014 based motor vehicle emissions budgets (MVEBs), which will be more stringent than Mobile6.2 based MVEBs currently being used. Current MVEBs were developed for the 1997 ozone attainment SIP, which was submitted to EPA in 2007. A net set of more stringent MVEBs will be even more important in case the implementation of the 2008 ozone NAAQS gets delayed for any reason.

Prerequisites for submittal of the maintenance plan for the 2008 ozone NAAQS

Two things are awaited from EPA before the Washington region can submit the maintenance plan for the 2008 ozone NAAQS.

1. EPA needs to officially extend the attainment deadline for the 2008 ozone NAAQS to July 20, 2016.
2. EPA needs to issue a Clean Data Determination for the Washington region for the 2008 ozone NAAQS.

Requirements for Redesignation

1. NAAQS Compliance - The request must contain a determination that the NAAQS has been attained.
2. Permanent and Enforceable Emission Reductions - The request must contain a showing that the improvement in air quality is due to permanent and enforceable reductions in emissions.
3. SIP Completeness - The applicable implementation plan must be fully approved by USEPA under § 110(k) of the CAA, and the redesignation request must contain a determination that the state meets all applicable requirements for the area under § 110 and Part D.
4. Maintenance Plan - A maintenance plan, including contingency measures, for the area under § 175A of the Act must be fully approved.

Components of a Maintenance Plan

1. Attainment year/Base year inventory – An attainment year emissions inventory for ozone precursors (VOC and NO_x) is required to identify the level of emissions sufficient to achieve the NAAQS. It should also include emissions during the time period associated with the monitoring data showing attainment of the 2008 ozone NAAQS. The region attained the above standard based on data during the period 2013 through 2015. An emissions inventory for 2014 seems most appropriate because it represents the typical inventory for the three-year period demonstrating attainment of the standard and is also a year for which a National Emissions Inventory (NEI) is required for submittal by states. Use of 2014 seems consistent with the USEPA provided guidance dated September 4, 1992 on the redesignation request and maintenance plan process in the memorandum from John Calcagni, Director, Air Quality Management Division to Regional Air Directions entitled Procedures for Processing Requests to Redesignate Areas to Attainment (redesignation guidance). The 2014 inventory is currently being developed by states as part of the National Emissions Inventory 2014 (NEI 2014) effort. This emissions inventory, which is being developed by states on an annual basis, will be the basis for the development of a typical summer day emissions inventory required for the ozone maintenance plan for that year.
2. Maintenance year and Intermediate year inventories & demonstration of maintenance - Maintenance of the attainment status in the future needs to be demonstrated by showing that future emissions of ozone precursors will not exceed the level of the attainment inventory over the 10-year period following redesignation. For this purpose, a future maintenance year and an intermediate year (between attainment year and maintenance year) need to be identified and emissions inventories need to be developed for those two years.
3. Continued operation of an appropriate air quality monitoring network - in order to verify the area's attainment status after redesignation.
4. States must ensure that it has the legal authority to implement and enforce all measures necessary to attain and maintain the NAAQS. States must verify continued attainment by indicating how maintenance plan progress will be tracked.
5. Contingency measures - must be available to promptly correct any NAAQS violation.