

# Maintenance Planning

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# The Clean Data Policy

- EPA allows nonattainment areas that no longer monitor violations of the NAAQS to be excused from submitting certain outstanding SIP elements. This CAA interpretation is known as the Clean Data Policy
  - May include reasonable further progress (RFP) requirements, attainment demonstrations, reasonable available control measures (RACM), and contingency measures
- Under the Clean Data Policy, EPA may issue a determination of attainment (informally called a “Clean Data Determination”)
- **Determination of attainment is *not* equivalent to a redesignation.**
  - States must still meet statutory requirements for redesignation to be redesignated to attainment

# Redesignation Process

- September 4, 1992 memo: “Procedures for Processing Requests to Redesignate Areas to Attainment”
  - Consolidates EPA's guidance re: processing requests for redesignation of nonattainment areas to attainment for ozone (O<sub>3</sub>), carbon monoxide (CO), particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead (Pb).
- [https://www.epa.gov/sites/production/files/2016-03/documents/calagni\\_memo\\_-\\_procedures\\_for\\_processing\\_requests\\_to\\_redesignate\\_areas\\_to\\_attainment\\_090492.pdf](https://www.epa.gov/sites/production/files/2016-03/documents/calagni_memo_-_procedures_for_processing_requests_to_redesignate_areas_to_attainment_090492.pdf)

# Redesignation Requirements

- Per CAA section 107(d)(3)(E), areas can be redesignated to attainment if the following conditions are met:
  - EPA determined that the NAAQS has been attained
  - The applicable SIP has been fully approved by EPA under section 110(k)
  - EPA determined that improvements in air quality are due to permanent and enforceable reductions in emissions
  - State has met all applicable requirements for the area under section 110 and Part D
  - EPA has fully approved a maintenance plan, including a contingency plan, for the area per section 175A

# Redesignation and Maintenance Planning Requirements

- Core Provisions for Redesignation Request
  - Demonstration of attainment (AQ data)
  - Attributable to permanent emission reductions
- Core Provisions for Maintenance Plan
  - Attainment inventory (emissions cap)
  - Future year inventories
  - Maintenance demonstration out to 10 years (emissions test)
  - Mobile emissions budgets
  - Contingency plan and measures

# Redesignation Request Requirements

Hampton Roads Area Fourth Highest 8-hour Average Values

**ARE YOU IN COMPLIANCE**

Monitor	AIRS ID #	2003	2004	2005	3-Year Average
Hampton	516500004	83	74	78	78
Suffolk – TCC	518000004	83	74	77	78
Suffolk – Holland	518000005	79	75	78	77

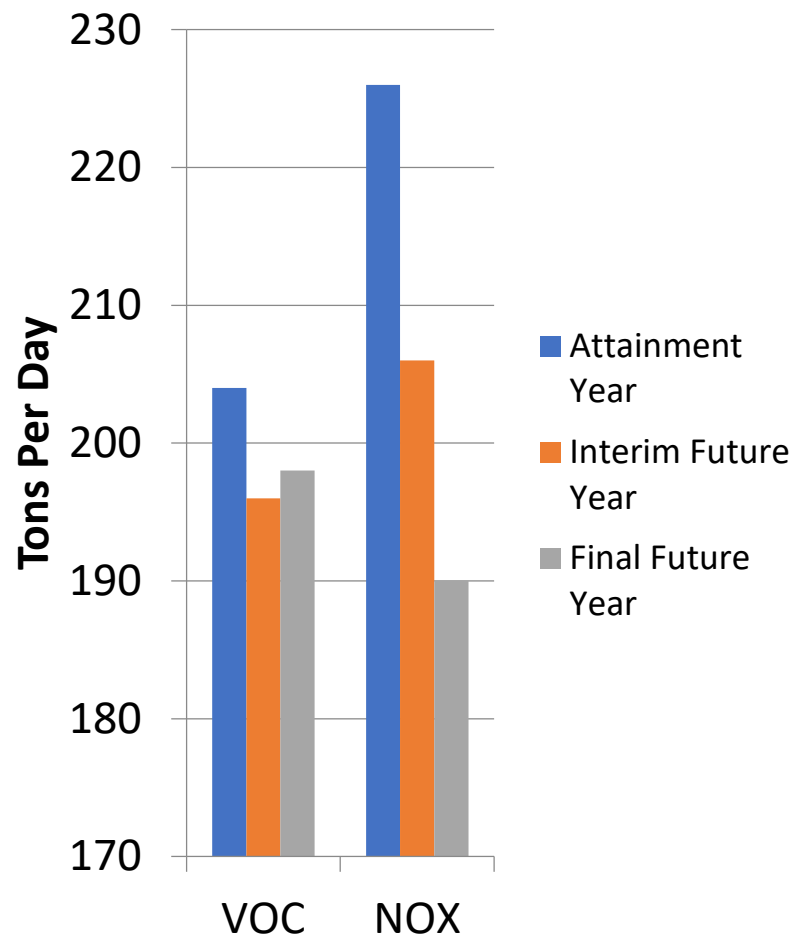
**HOW DID YOU GET THERE**

Total VOC, NO<sub>x</sub> and CO Emissions for 2002 and 2005

Volatile Organic Compounds (VOC)					
Year	Point	Area <sup>1</sup>	Nonroad	Mobile	Total
Year 2002	18.758	87.402	46.543	67.293	219.996
Year 2005	20.091	91.980	42.320	50.591	204.982
DIFF. (02-05)	1.333	4.578	-4.223	-16.702	-15.014
Nitrogen Oxides (NO <sub>x</sub> )					
Year	Point	Area	Nonroad	Mobile	Total
Year 2002	91.403	57.961	31.002	93.844	274.210
Year 2005	62.536	55.207	30.208	78.169	226.120
DIFF. (02-05)	-28.867	-2.754	-0.794	-15.675	-48.090
Carbon Monoxide (CO)					
YEAR	Point	Area	Nonroad	Mobile	Total
Year 2002	91.282	58.950	394.471	848.362	1,393.065
Year 2005	91.306	56.555	417.125	642.103	1,207.089
DIFF. (02-05)	0.024	1.605	22.654	-206.259	-181.976

# Maintenance Plan Emissions Test

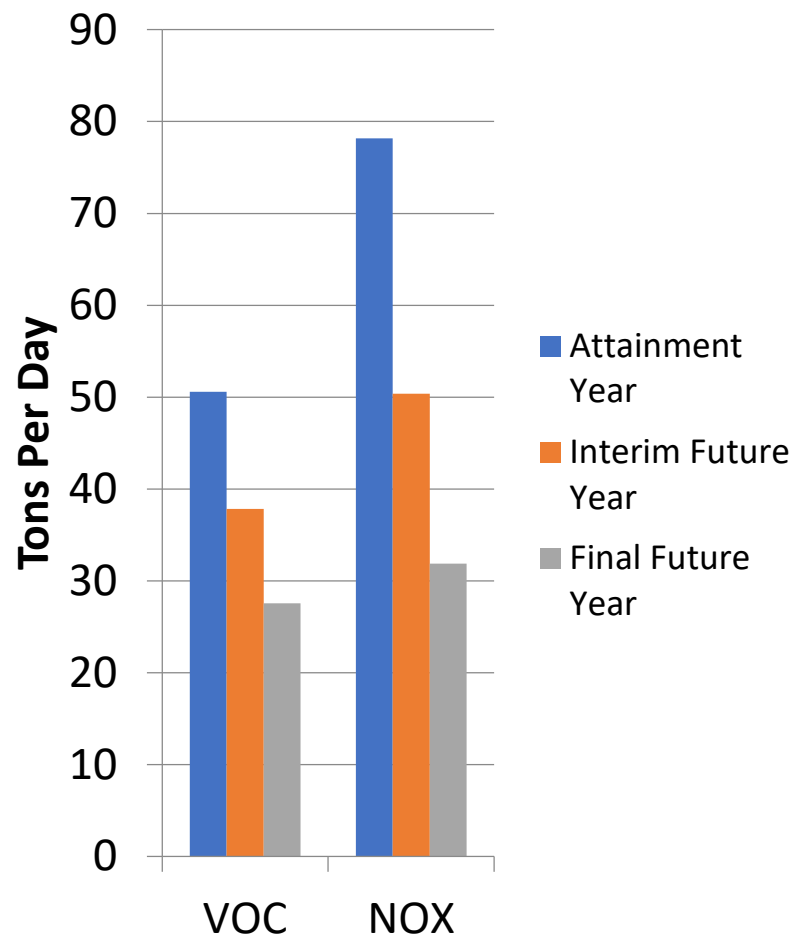
Table 2-1					
VOC Emissions, Tons per Typical Summer Weekday					
Year	Point	Area	Nonroad <sup>1</sup>	Mobile <sup>2</sup>	Total
2002	18.758	87.402	46.543	67.293	219.996
2005	20.091	91.980	42.320	50.591	204.982
Difference 2002-2005	1.333	4.578	-4.223	-16.702	-15.014
2011	23.280	100.960	33.912	37.846	195.998
Difference 2005-2011	3.189	8.980	-8.408	-12.745	-8.984
2018	26.700	112.790	31.315	27.574	198.379
Difference 2005-2018	6.609	20.810	-11.005	-23.017	-6.603
NO <sub>x</sub> Emissions, Tons per Typical Summer Weekday					
Year	Point	Area	Nonroad <sup>1</sup>	Mobile <sup>2</sup>	Total
2002	91.403	57.961	31.002	93.844	274.210
2005	62.536	55.207	30.208	78.169	226.120
Difference 2002-2005	-28.867	-2.754	-0.794	-15.675	-48.090
2011	69.333	56.974	29.116	50.387	205.810
Difference 2005-2011	6.797	1.767	-1.092	-27.782	-20.310
2018	75.241	60.105	23.093	31.890	190.329
Difference 2005-2018	12.705	4.898	-7.115	-46.279	-35.791



# Maintenance Plan Mobile Budgets

Maintenance Plan On-Road Mobile Source Emissions Budgets

Year	VOC Emissions (tpd)	NO <sub>x</sub> Emissions (tpd)
2005 Attainment Year	50.591 tons/day	78.169 tons/day
2011 Predicted Emissions	36.846 tons/day	47.387 tons/day
Conformity Buffers	1.000 ton/day	3.000 tons/day
2011 Interim Budget Year	37.846 tons/day	50.387 tons/day
2018 Predicted Emissions	26.574 tons/day	28.890 tons/day
Conformity Buffers	1.000 ton/day	3.000 tons/day
2018 Final Budget	27.574 tons/day	31.890 tons/day





**Any questions or comments?**