30 APR 1992

MEMORANDUM

SUBJECT: Maintenance Plans for Redesignation of Ozone and Carbon Monoxide Nonattainment Areas

FROM: G.T. Helms, Chief
       Ozone/Carbon Monoxide Programs Branch (MD-15)

TO: Air Branch Chief, Regions I-X

The purpose of this memorandum is to provide clarification of an issue related to maintenance plans for ozone and carbon monoxide. This issue concerns the maintenance demonstration and, in particular, the projection of emissions. In order to make the review of the demonstration easier for both EPA Regions and Headquarters, State submittals should clearly show the procedure used to project future emissions. There has been some concern that if the procedure is not clear, it is very difficult to evaluate the demonstration. The procedure used should be consistent with the guidance contained in the EPA document "Procedures for Preparing Emission Inventory Projections" (EPA-450/4-91-019). According to this document, projected emissions should reflect the allowable emission rate and the expected actual production or activity level.

If you have any further questions concerning this subject, please contact Laurel Schultz at (919) 541-5511.