



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

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MEMORANDUM

SUBJECT: Use of Actual Emissions in Maintenance Demonstrations
for Ozone and Carbon Monoxide (CO) Nonattainment Areas

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This memorandum provides guidance on the use of actual emissions in maintenance demonstrations for ozone and CO nonattainment areas seeking redesignation to attainment. This guidance supersedes previous Environmental Protection Agency (EPA) guidance set forth in the September 4, 1992 memorandum from John Calcagni to Air Division Directors, "Procedures for Processing Requests to Redesignate Areas to Attainment" (redesignation policy), which required emission projections for these areas to be based on allowable emissions.

The EPA has previously issued guidance on the use of actual emissions in projecting emissions to meet the requirements for the 15 percent rate-of-progress plans for ozone nonattainment areas.¹ For consistency, this memorandum extends the policy of using actual emissions to maintenance projections for ozone and CO areas, as well. This guidance is not intended to apply to emission projections in control programs for the other criteria pollutants (see discussion under "Other Pollutants").

¹See Guidance for Growth Factors, Projections, and Control Strategies for the 15 Percent Rate-of-Progress Plans (EPA-452/R-93-002, March 1993).

Ozone and CO Policy

Actual emissions from a source are the emissions based on the source's actual operating hours, production rates, and control equipment for the processes carried out at the source. Actual emissions take into consideration normal operating conditions as well as instances when deviations occur. For ozone and CO areas, the term allowable emissions refers to emissions estimates based on enforceable emission rates and actual production rates and hours.

Consistent with the earlier rate-of-progress plan guidance, ozone and CO maintenance projections may be based on actual emissions for sources or source categories that are currently subject to a regulation and that the State does not anticipate subjecting to additional regulation. Similarly, the maintenance projections may be based on actual emissions for sources or source categories that are currently unregulated and are not expected to be subject to future regulation. (The State still has the option of using allowable emissions for these two cases.) However, for sources that are expected to be subject to additional regulation, the projections must be based on the new allowable emissions limits because the new actual emissions are not yet known.

Upon approval of a redesignation request and associated maintenance plan by EPA, all future emissions calculations or projections to implement other air quality requirements for an area must be consistent with the maintenance demonstration (unless a more stringent requirement applies). For example, if projected emissions from a source used in the maintenance demonstration are based on actual emissions, that source must use actual emissions in determining the credit available for emissions trading, innovative strategies, economic incentive plans, and emissions budgets.

Other Pollutants

Under the redesignation policy, emissions projections for particulate matter (PM-10), sulfur dioxide (SO₂), nitrogen dioxide, and lead (Pb) nonattainment areas are still required to follow current EPA modeling guidance.² The modeling guidance requires that maximum allowable emission limits for major point sources be used in demonstrating maintenance of short-term

²The EPA-approved modeling guidance may be found in the following documents: "Guideline on Air Quality Models (Revised)" (EPA-450/2-78-027R, July 1987) and "PM-10 SIP Development Guideline" (EPA-450/2-86-001, June 1987).

standards.³ It is necessary to continue the use of maximum allowable emissions when projecting emissions for these nonattainment areas because, in some cases, large point sources operating at full capacity could by themselves cause an exceedance of the applicable national ambient air quality standard. In contrast, large point sources are not likely to be dominant emission sources in inventories for ozone and CO nonattainment areas, and it is unlikely that the multitude of smaller sources would be operating at maximum capacity simultaneously.

For further information regarding the use of actual and allowable emissions for maintenance demonstrations for ozone and CO areas, please contact Carla Oldham at (919) 541-3347. For information on projecting emissions for SO₂, PM-10, and Pb nonattainment areas, please contact Robin Dunkins at (919) 541-5335.

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³Maximum allowable emissions are calculated using the enforceable (i.e., allowable) emission rate multiplied by the maximum operating capacity of that source at continuous operation (unless there are federally-enforceable limits on the hours of operation).