reasonable further progress (15% plan) and attainment demonstrations for as long as the area continues to meet the standard. It is expected that such a determination will soon be made, in separate rulemaking, for the CAL area. If such a determination is made, the final approval of the CAL redesignation request will no longer be contingent upon USEPA approval of the 15% plan or the attainment demonstration.

C. The Improvement in Air Quality Must Be Due to Permanent and Enforceable Reductions in Emissions Resulting From the SIP, Federal Measures, and Other Permanent and Enforceable Reductions

The State must be able to reasonably attribute the improvement in air quality to emission reductions which are permanent and enforceable. To satisfy this requirement, the State should estimate the percent reduction from the year that was used to determine the design value for designation and classification achieved from Federal measures and control measures that have been adopted and implemented by the State. Emission rates, production capacities and other information should be used in the estimation. Sources should be assumed to operate at permitted or historic peak levels unless evidence is presented that such an assumption is unrealistic.

The OEPA submittal documents reductions in emission from 1990 to 1993. The year 1988 was the year which determined the design value and should have been the year from which reductions were calculated. This comment was made to OEPA in a January 6, 1995, letter from William L. MacDowell, Section Chief, Regulation Development Section, Region 5, to Mary Cavin, Hearing Clerk, OEPA. The OEPA responded that the result of using 1988 instead of 1990 as the base year would be that a greater reduction of emissions would have been calculated. The USEPA agrees that the use of 1988 data would not have affected the conclusion that the reductions in emissions from permanent and enforceable programs have resulted in improved air quality in the area and therefore accepts the reductions as calculated.

The OEPA submittal states that the 1993 emissions inventory is reflective of attainment conditions. The OEPA states that the reductions in emissions from the base year are achieved from the implementation of two federal programs; lower fuel volatility and the Federal Motor Vehicle Control Program

(FMVCP). These programs are permanent and federally enforceable. The motor fuel volatility Phase I standards became effective nationwide in the summer of 1989, and established a volatility limit in the CAL area of 10.5 pounds per square inch Reid Vapor Pressure (RVP). The RVP was further lowered in 1992 to 9.0 pounds per square inch. The total reduction in mobile source VOC emissions from 1990 to 1993 was 66 tons per day. These reductions were quantified using the MOBILE5A model.

From the years 1990 to 1993, point source VOC emissions increased by 2.7 tpd, while area source emissions decreased by 1.8 tpd. Area sources were assumed to change, based on historical population information as interpolated by Bureau of Economic Analysis (BEA) data for the years 1988 to 1995, on industrial employment data, and on gasoline sale trends. Point source emissions for 1990 were developed from reports submitted to the local air agencies by facilities with actual combined VOC emissions of 10 tons per year or more. The following table shows VOC emissions for area, point, and mobile sources from 1990 to 1993.

	1990	1993
Area (TPD) Point Mobile	147.7 74.7 248.4	145.9 77.4 182.3
Total	470.8	405.6

The State has shown that actual total VOC emissions were reduced by 14 percent or about 65 tons per day from 1990 to 1993; due primarily to mobile source reductions. Although the State did not calculate reductions based on a design year (i.e., 1988) emissions inventory, the demonstration that was submitted is adequate to show that actual reductions of VOC emissions have occurred in the area. The reduction in emissions shown in the submittal has been reasonably attributed to two programs: lower fuel volatility and the Federal Motor Vehicle Control Program. Both of the programs result in permanent and enforceable reductions in VOC emissions, and, therefore, the requirement of section 107(d)(3)(E)(iii) is satisfied.

D. The Area Must Have a Fully Approved Maintenance Plan Meeting the Requirements of Section 175A

Section 175A of the CAA defines requirements for maintenance plans. The maintenance plan is a SIP element

which provides for maintenance of the relevant NAAQS in the area for at least 10 years after redesignation. There are five core provisions which the maintenance plan should address: the attainment inventory, maintenance demonstration, monitoring network, verification of continued attainment, and a contingency plan. The attainment inventory should identify the level of emissions in the area which is sufficient to attain the ozone NAAQS and should include the emissions during the time period associated with the monitoring data showing attainment. Maintenance is demonstrated by showing that future emissions will not exceed the level of the attainment inventory. Modeling may also be used to show that the future combination of sources and emission rates will not cause a violation of the NAAQS. The maintenance plan must also provide for continued operation of an appropriate air quality monitoring network to verify the attainment status of the area. The plan must indicate how the State will track the progress of the maintenance plan. Finally, the maintenance plan must include contingency measures to promptly correct any violation of the ozone NAAQS that occurs after redesignation of the area to attainment.

Attainment Inventory

The CAL area submittal contained inventories of 1990 actual VOC emissions from stationary, area, and mobile sources. The year 1990 was selected as the base year and used to project emissions to future years. The 1993 emissions inventory is considered as the attainment year inventory because no ozone violations have occurred since 1991, and the 1993 projections were performed per USEPA guidance. The approvability of the emission inventories will be addressed in a separate rulemaking. Final approval of the CAL nonattainment region emission inventories is needed before the redesignation request can be approved.

Maintenance Demonstration

The CAL area submittal shows projected VOC, NO_X , and CO emissions from the 1990 base year for the years 1993, 1996, 2000, and 2006. The projections show that the level of emissions established for the attainment year inventory will not be exceeded. The following tables list the VOC and NO_X emissions for the base year, final year and interim years.