documentation provided by the state, assesses whether the emissions were developed according to current EPA guidance, and evaluates the quality of the data.

The level III review process is outlined here and consists of 10 points that the inventory must include. For a base year emission inventory to be acceptable it must pass all of the following acceptance criteria:

• Was there an approved Inventory Preparation Plan (IPP)? Was the QA program contained in the IPP implemented and was its implementation documented?

• Was documentation adequate to enable the reviewer to determine the emission estimation procedures and the data sources used to develop the inventory?

• Is the point source inventory complete?

• Were point source emissions prepared/calculated according to current EPA guidance?

• Is the area source inventory complete?

• Were the area source emissions prepared/calculated according to current EPA guidance?

 Were biogenic emissions prepared/ calculated using PC–BEIS according to current EPA guidance?

• Was the method (e.g., Highway Performance Monitoring System (HPMS), network transportation planning model) used to develop Vehicles Miles Traveled (VMT) estimates in accordance with EPA guidance, and was it adequately described and documented in the inventory report?

• Was the MOBILE 4.1 vehicle emissions model correctly used to produce emission factors for each of the eight MOBILE 4.1 vehicle classes?

• Were the emission estimates for non-road source categories correctly prepared according to current EPA guidance?

The base year emission inventory is approvable if it passes Levels I, II, and III of the review process. Detailed Level I and II review procedures can be found in the following document: "Quality Review Guidelines for 1990 Base Year Emission Inventories," U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, NC, July 27, 1992. Level III review procedures are specified in a memorandum from David Mobley and G.T. Helms to the Regions "1990 O₃/CO SIP Emission Inventory Level III Acceptance Criteria," October 7, 1992 and revised in a memorandum from John Seitz to the Regional Air Directors dated June 24, 1993.

B. Procedural Background

The Act requires states to observe certain procedural requirements in developing emission inventory submissions to EPA. Section 110(a)(2) of the Act provides that each emission inventory submitted by a state must be adopted after reasonable notice and public hearing.1 Final approval of the inventory will not occur until the state revises the inventory to address public comments. EPA created a "de minimis" exception to the public hearing requirement for minor changes. EPA defines "de minimis" for such purposes to be those in which the 15 percent reduction calculation and the associated control strategy or the maintenance plan showing, do not change. States will aggregate all such "de minimis" changes together when making the determination as to whether the change constitutes a SIP revision. The states will need to make the change through a formal SIP revision process, in conjunction with the change to the control measure or other SIP programs. Section 110(a)(2) of the Act similarly provides that each revision to an implementation plan submitted by a state under the Act must be adopted by such state after reasonable notice and public hearing.

C. State Submittal

The State of New Jersey held a public hearing on October 14 and 19, 1993 to receive public comment on the 1990 base year emission inventory for the Atlantic City, New York/Northern New Jersey/Long Island, Philadelphia/ Wilmington/Trenton, and Allentown/ Bethlehem/Easton nonattainment areas of New Jersey. The inventory was adopted by the State and signed and submitted by the Commissioner on November 15, 1993 as a proposed revision to the SIP. On November 21, 1994, New Jersey submitted a technical amendment to its carbon monoxide SIP, which included revisions to the 1990 base year ozone emission inventory. In a letter dated April 16, 1994, EPA found the emission inventory to be complete.

Based on EPA's level III review findings, New Jersey has satisfied all of EPA's requirements for purposes of providing a comprehensive, accurate, and current inventory of actual emissions in the ozone nonattainment areas. A summary of EPA's level III findings is given below:

• New Jersey submitted an Inventory Preparation Plan for the Development of Ozone/CO SIP Inventory of Base Year 1990 Emissions, dated August 1991 and revised April 1992. This Plan contained a Quality Assurance Plan which was implemented and documented.

• The inventory is well documented. New Jersey provided documentation detailing the methods used to develop emissions estimates for each category. In addition, New Jersey identified the sources of data used in developing the inventory.

• The point and area source inventories are complete and were prepared/calculated in accordance with EPA guidance.

• New Jersey biogenic emissions were prepared/calculated using the July, 1991 version of PC–BEIS according to current EPA guidance.

• The method used to develop VMT estimates was in accordance with EPA guidance and was adequately described and documented in the inventory report.

• The most current version of the mobile model was used correctly for each of the eight vehicle classes.

• Emission estimates for the non-road mobile source categories were correctly prepared according to EPA guidance.

Based on EPA guidance, the inventory is complete and approvable. A more detailed discussion of how the emission inventory was reviewed and the results are presented in the supporting TSD.

A summary of the emission inventories broken down by point, area, biogenic, on-road, and non-road mobile sources are presented in the following tables:

¹Also Section 172(c)(7) of the Act requires that plan provisions for nonattainment areas meet the applicable provisions of Section 110(a)(2).