



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

April 6, 1987

**MEMORANDUM**

SUBJECT: Ozone Redesignation Policy

FROM: Gerald A. Emison, Title  
Office of Air Quality Planning and Standards (MD-10)

TO: Director, Air Management Division  
Regions I, III, IX  
Director, Air and Waste Management Division  
Region II  
Director, Air, Pesticides, and Toxics Management Division  
Regions IV, VI  
Director, Air and Radiation Division  
Region V  
Director, Air and Toxics Division  
Regions VII, VIII, X

Recently, Region V responded to questions from the State of Michigan regarding the Environmental Protection Agency's ozone redesignation policy. My staff and the Office of General Counsel assisted in preparing that response.

That letter, which I have attached for your information and use, addresses many concerns about redesignations previously encountered in day-to-day review of these actions at Headquarters. The letter supplements the Sheldon Meyers April 21, 1983, redesignation policy guidance. It should be utilized by Regional staff when they discuss documentation requirements with their States and review requests for redesignations

Also attached is boilerplate language that should be inserted into all final Federal Register notices on ozone redesignations. This language serves notice that redesignations are not to be used as justification for noncompliance or regulation relaxations.

If you have any questions regarding the attached correspondence, please contact Tom Helms at FTS 629-5526.

Attachments

cc: R. Campbell  
T. Helms  
J. Silvasi  
B. Beal  
P. Wyckoff  
L. Wilson  
J. Rasnic  
S. Hitte  
R. Ossias

Attachment

OZONE REDESIGNATION BOILERPLATE

Control Strategy Implementation

Ozone State implementation plans (SIP's) are designed to satisfy the requirements of Part D of the Clean Air Act and to provide for attainment and maintenance of the ozone NAAQS. This redesignation today should not be interpreted as authorizing the State to delete, alter, or rescind any of the VOC emission limitations and restrictions contained in the approved ozone SIP. Changes to ozone SIP VOC regulations rendering them less stringent than those contained in the EPA approved plan cannot be made unless a revised plan for attainment and maintenance is submitted to and approved by EPA. Unauthorized relaxations, deletions, and changes could result in both a finding of nonimplementation [section 173(b) of the Clean Air Act] and in a SIP deficiency call made pursuant to section 110(a)(2)(H) of the Clean Air Act.