



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

June 2, 1988

**MEMORANDUM**

SUBJECT: Rulemaking Notices on Redesignations

FROM: G. T. Helms, Chief  
Control Programs Operations Branch (MD-15)

TO: Chief, Air Branch, Regions I-X

THRU: Darryl D. Tyler, Director  
Control Programs Development Division (MD-15)

Our review of redesignations has identified a significant problem that has been present in many of the packages we have seen. That problem is the lack of adequate discussion and documentation of the requirement for an implemented control strategy which has been approved by EPA. Although this problem has been noted most recently with regard to ozone, it is also applicable to other pollutants.

Very few notices mention this as a requirement for a redesignation and, similarly, very few discuss the control strategy for the area to be redesignated. For a full discussion of this requirement, please see the two relevant policy memos: Sheldon Meyers to Air and Waste Management Division Directors, "Section 107 Designation Policy Summary," April 21, 1983, and G. T. Helms to Air Branch Chiefs, "Section 107 Questions and Answers," December 23, 1983. I am attaching the most important passages from these memos. This requirement is reiterated in Darryl Tyler's October 8, 1985, memorandum on ozone redesignations.

It appears, in some cases, that the requirements for redesignations are in "canned language" on some Regional word processors. Please make sure that the control strategy requirements are included and fully discussed in each redesignation notice. This deficiency is delaying Headquarters processing time and causing us to expend efforts which could be used more productively. Many of these redesignations turn out to be approvable after these questions are addressed, but it would simplify matters for everyone if this were done as the notice is prepared.

Our office is currently developing more specific criteria on what constitutes an adequate control strategy but, in the meantime, we need to at least include the minimal language asked for in these 1983 memos.

One final point: the April 21, 1983, memorandum cited above allowed redesignations for ozone to be made under certain conditions, with fewer than 3 years of monitoring data showing no violations when a full 3 years of data were not available. However, ozone monitors have been in place in virtually all nonattainment areas for well over 3 years. Therefore, we expect in all but rare cases future requests for redesignations from nonattainment to attainment for ozone to be supported

by an average, expected exceedance of 1.0 or less, averaged over the previous 3 years.. Thank you for your assistance on this. If you have further questions, contact Larry Wilson (629-5516) or Bill Beal (629-5665).

Attachment

cc: R. Campbel  
G. Emison  
B. J. Steigerwald  
B. Beal  
J. Silvasi  
J. Yarn  
L. Wilson

Attachment

EXCERPTS FROM SECTION 107 POLICY MEMOS DEALING  
WITH CONTROL STRATEGIES

- I. From Sheldon Meyers to Air and Waste Management Division Directors, "Section 107 Designation Policy Summary," April 21, 1983 (emphasis added):

Policy for Reviewing 107 Designations

1. Data: In general, all available information relative to the attainment status of the area should be reviewed. These data should include the most recent eight (8) consecutive quarters of quality assured, representative ambient air quality data plus evidence of an implemented control strategy that EPA had fully approved. Supplemental information, Inc using air quality modeling emissions data, etc., should be used to determine if the monitoring data accurately characterize the worst case air quality in the area.

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Although the current ozone standard implies the need for three years of data for attainment designations, two years of data with no exceedances is an acceptable surrogate. As discussed previously, this should be accompanied by evidence of an implemented control strategy that EPA had fully approved.

- II. From G. T. Helms to Air Branch Chiefs, "Section 107 Questions and Answers," December 23, 1983 (emphasis added):

1. Is air quality data alone sufficient for a redesignation from nonattainment to attainment?

Answer: No. Valid air quality data showing no NAAQS violations must be supplemented with a demonstration that the approved SIP control strategy which provides for attainment has been implemented. The April 21 memo describes the requirements in detail. In most cases, the submittal will include the most recent eight quarters of data showing attainment and evidence of an implemented control strategy that EPA had approved. This demonstration need not necessarily be quantitative. Rather, it need simply confirm that the control strategy approved in the SIP to address the problem has indeed been implemented. Where only the most recent four quarters of data showing attainment are available, a state-of-the-art modeling analysis must be provided which quantifies that the SIP strategy is sound and that actual enforceable emission reductions are responsible for the air quality improvements.