UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 16, 1992

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Correction of State Implementation Plan Submittals Table

FROM: Michael H. Shapiro
Deputy Assistant Administrator for Air and Radiation

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

Several of the northeast States have inquired about an unclear section of the table contained in the attachment to my July 22, 1992 memorandum to you, "Guidelines for State Implementation Plan (SIP) Submittals Due November 15, 1992." This memorandum corrects the table and clarifies the Environmental Protection Agency's (EPA) expectations for ozone transport region SIP submittals.

The table lists major required State submittals, and indicates whether a full submittal is expected or if a committal SIP is acceptable. Under the Ozone Transport Region subheading, the submittal requirements are listed in two groups. Due to an oversight, no indicators were provided for the first group [which includes volatile organic compounds (VOC) reasonably available control technology (RACT), nitrogen oxides (NOx) RACT, and new source review (NSR) requirements] to show whether full or committal SIP's are expected. In addition, no line was drawn between the first and second groups. Therefore, some have questioned whether the marking under the committal SIP column, intended for the second group [enhanced inspection and maintenance (I/M)], is referring to both groups. To clarify EPA's guidelines on ozone transport region submittals, EPA expects full submittals for VOC RACT and NSR requirements. The EPA will approve a committal SIP for NOx RACT only in cases where credible photochemical grid modeling has not been completed and where modeling efforts are under way. The EPA will accept committal SIP's for enhanced I/M.

A corrected table is attached. The original table has been replaced by the corrected table on the Office of Air Quality, Planning and Standards' Technology Transfer Network bulletin board.

We apologize for any confusion the error in the table may have caused. If you have further questions, please contact Tom Helms at (919) 541-5527.

Attachment

cc: J. Armstrong, OMS
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* Call Ozone/CO Branch to obtain hardcopy of memo, including table

* See follow-up memo of September 16, 1992, "Correction of State Implementation Plan Submittals Tables," from Michael H. Shapiro.