

ON THE ROAD TO REDESIGNATION



Implications of Attaining the Federal Ozone Standard

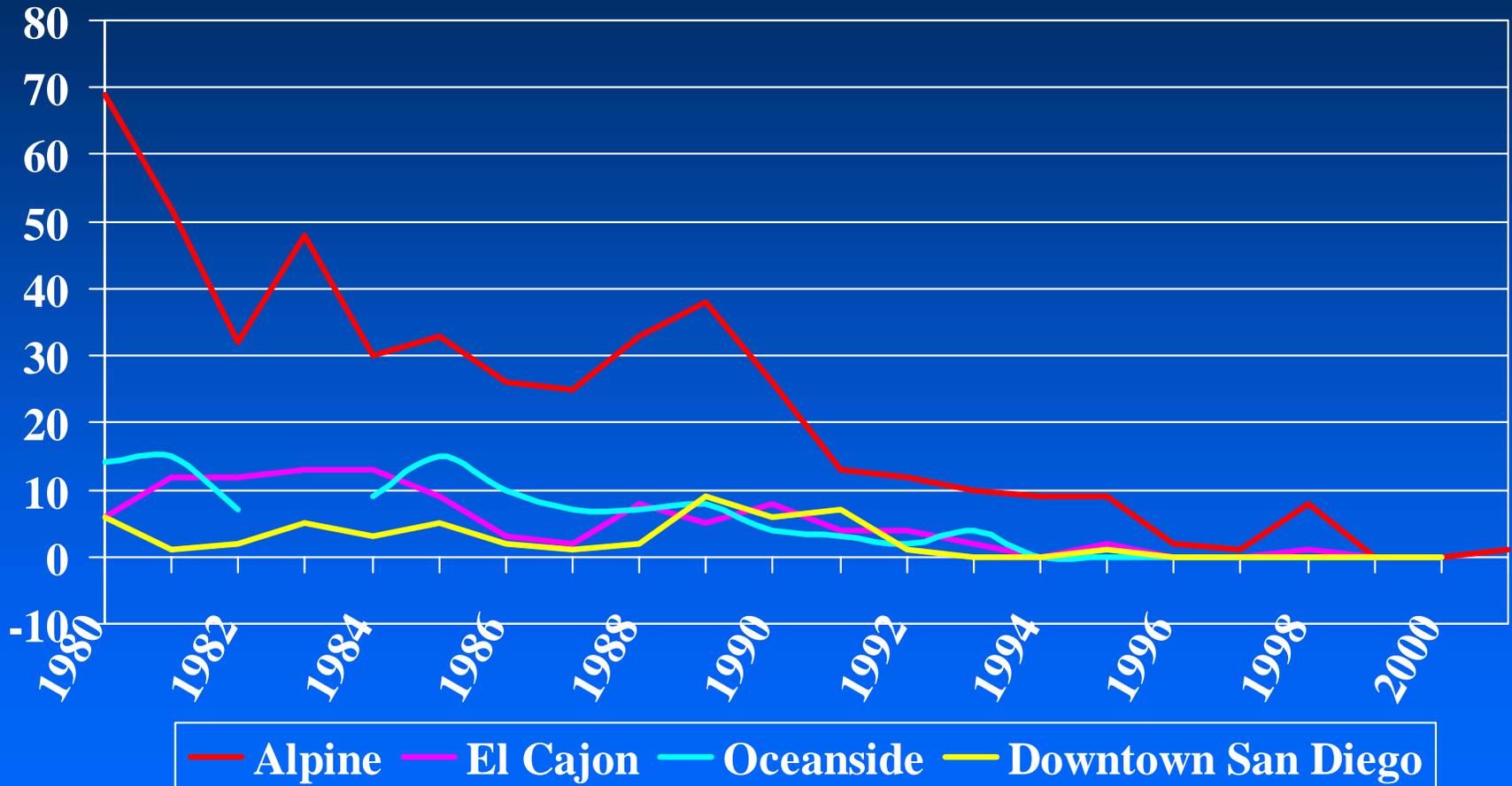
One-Hour Ozone NAAQS

- Established in 1979
- One-hour standard of 0.12 ppm
 - Both primary and secondary standards
- Attainment
 - No more than three exceedances in a three-year period at any monitoring site

Review of Designations & Classifications

- Designated nonattainment in 1978
- Reaffirmed in November 1990
 - Classified as Severe
 - Attain by 2005
- Classification corrected to Serious in January 1995
 - Attain by 1999
 - Up to two 1-year extensions possible
 - If no more than 1 exceedance

Days Over Federal 1-Hour Ozone Standard



Federal 1-Hour Ozone Status

	1999	2000	2001
Chula Vista	0	0	0
El Cajon	0	0	0
Oceanside	0	0	0
Kearny Mesa	0	0	1
Escondido	0	0	1
Alpine	0	0	1
Downtown	0	0	0
Otay Mesa	0	0	0

Next Steps

- **EPA “determination of attainment”**
 - Anticipated this year, but not required
 - Regardless, remain Serious nonattainment
- **Complex & lengthy redesignation process**
 - Demonstrate CAA criteria have been met
- **CEQA**
- **Schedule**
 - Workshop – July '02
 - Air Pollution Control Board – September '02
 - Air Resources Board – January '03
 - EPA – 18 months to review (< 12 months anticipated)
 - EPA action – 2003

Implications of Redesignation

- **Emission control requirements unaffected**
 - **State BACT \approx LAER**
- **AQIA requirements unaffected**
 - **Must not cause violation of clean air standards**

Implications of Redesignation

- **Prevent Significant Deterioration (CAA §160)**
 - Supplants NSR; no offsets – Rule 20.3(d)(3)
 - Specified 100-ton sources & all 250-ton sources
 - Cannot exceed “air quality increments” in:
 - Class I areas (Agua Tibia, San Jacinto, Joshua Tree)
 - Class II areas (everywhere else)
 - Soils & vegetation impact analysis
 - Visibility impairment analysis
- **NSR restored upon 8-hour ozone designation**
 - Recent Court ruling rejects legal challenges
 - Designations anticipated in 2004

Implications of Redesignation

- **Title V permit applicability (CAA 501(2))**
 - 100 tons/year for VOC or NO_x
- **General conformity thresholds (40 CFR part 93)**
 - 100 tons/year for VOC or NO_x

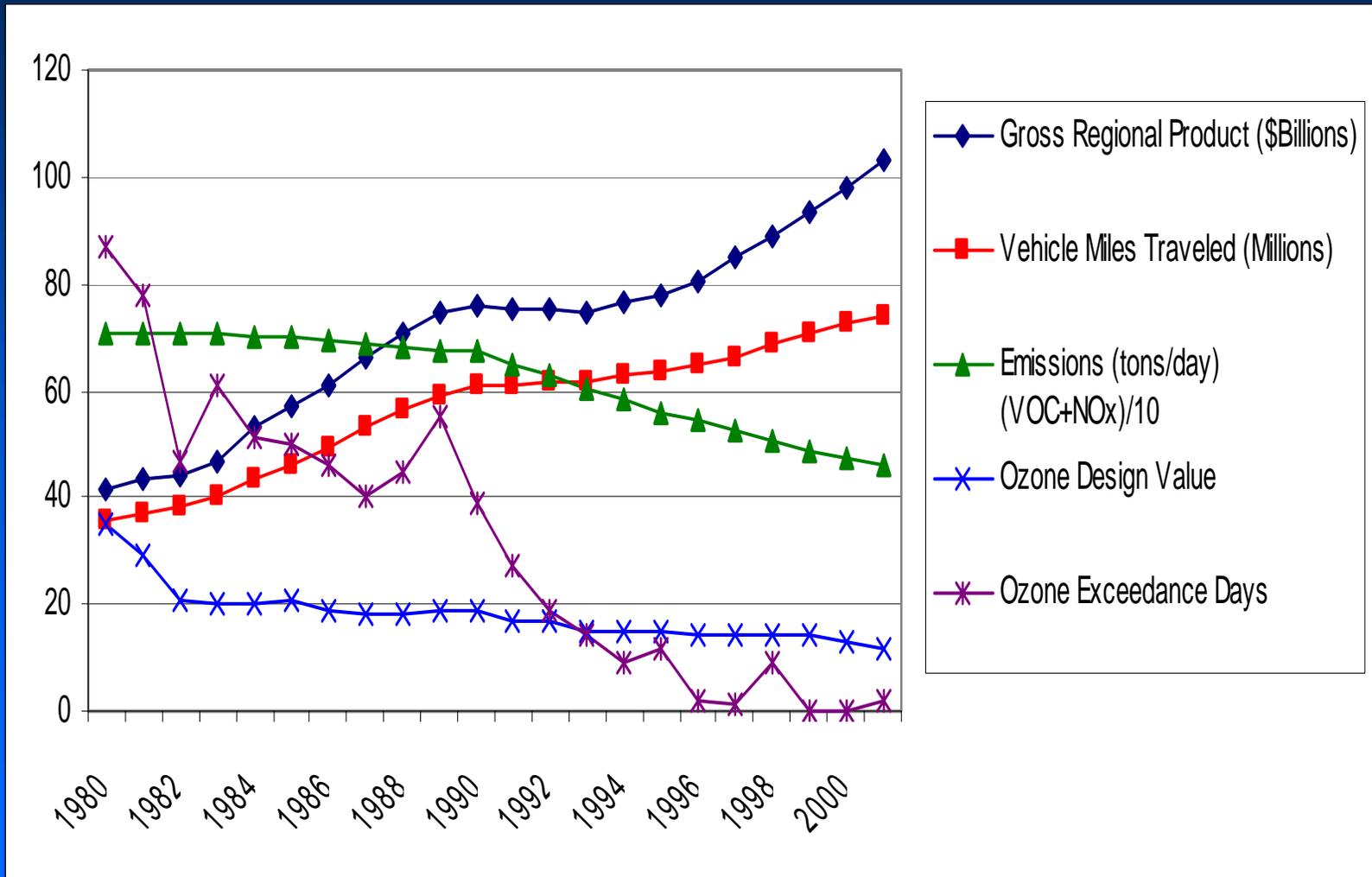
Criteria for Redesignation

- **Attainment of standard**
 - Quality-assured monitoring data
- **Comply with CAA requirements**
 - **Section 110 – fundamental SIP provisions**
 - Monitoring, modeling, rules, permits, enforcement
 - EPA approved December '83 & January '97
 - **Part D – nonattainment SIP requirements**
 - RACT, RFP, NSR, conformity
 - RACT rule addressing wood coatings operations
 - Full NSR approval **not** prerequisite

Criteria for Redesignation

- Fully approved SIP
 - January '97
- Attainment result of SIP implementation
 - Permanent, enforceable emissions reductions
 - Over 200 ton/day reduction since 1990

Improvement Despite Growth



Maintenance Plan

■ Maintenance strategy

- No relaxation in emission controls or rules
- PSD in lieu of NSR

■ Maintenance demonstration

- Continued attainment through 2015
 - Ozone precursors will further decline 137 tpd

■ Contingency plan

- Implement upon a violation (4 exceedances)
- Impose VOC & NO_x offset requirements
 - 1:1 ratio for new & modified 100-ton sources

Summary

- **Attained national one-hour standard**
- **Emissions downtrend to continue**
- **Initiated redesignation process**
- **Board consideration – September '02**
- **EPA action – '03**
 - **Emission control & AQIA requirements same**
 - **PSD in lieu of NSR**
- **8-hour designation anticipated 2004**
 - **NSR restored**