

# Update on the MAG Eight-Hour Ozone Moderate Area Plan for the Maricopa Nonattainment Area



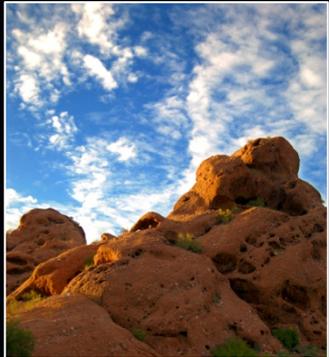
**MAG Air Quality Technical Advisory Committee**  
**March 24, 2016**



ENVIRONMENTAL  
PROGRAMS

# Moderate Area Requirements

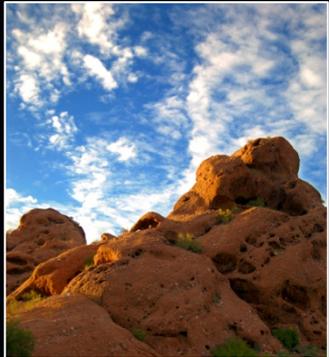
- Moderate Area Plan due January 1, 2017
- Plan is required to demonstrate at least a 15 percent reduction in anthropogenic volatile organic compound emissions over a six year period (2012-2017)
- Attainment date is July 20, 2018
- Since the attainment date is in the middle of the summer ozone season, the plan is required to demonstrate attainment in the prior 2017 ozone season
- Region will need three years of clean data at the monitors in 2017 to meet the standard



## Moderate Area Requirements (continued)

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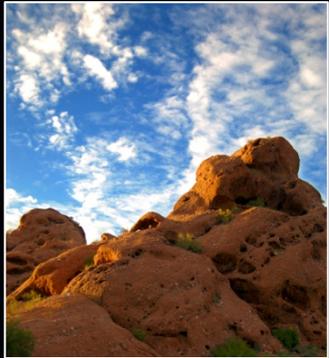
- Reasonably available control technology (RACT)
- Reasonably available control measures (RACM)
- New source review
- Emissions inventories
- Contingency measure
- Motor Vehicle Emissions Budgets
- Motor vehicle inspection and maintenance program
- Emissions offset requirement for major industries (1.15 to 1)



# Reasonably Available Control Technology (RACT)

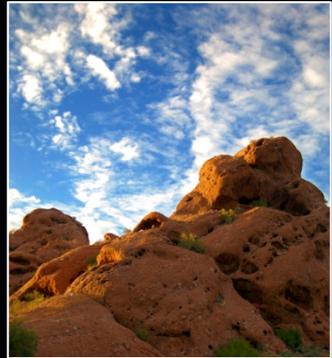
## ENVIRONMENTAL PROGRAMS

- Clean Air Act Section 182(b)(2) requires Moderate Areas to implement reasonably available control technology (RACT)
- This requirement to meet RACT for Moderate Areas is an independent requirement of what is needed for attainment
- EPA defines RACT as “the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility”
- RACT for Moderate Areas applies to stationary sources of VOC and NOx
  - All major sources of VOC or NOx (100 tons per year)
  - Stationary sources of VOC and NOx for which EPA has issued Control Techniques Guidelines (CTG) or Alternative Control Techniques (ACT)



# Reasonably Available Control Technology (RACT)

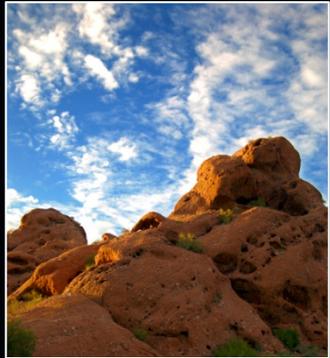
## ENVIRONMENTAL PROGRAMS



- EPA states that RACT needs to be current, as RACT changes over time as technology develops
  - EPA encourages states to review rules in other states to help determine what is current RACT
- Maricopa County Air Quality Department is in the process of reviewing and revising their stationary source VOC and NOx rules to meet RACT requirements
- Pinal County Air Quality Control District has indicated that there are two source categories in the Pinal County portion of the nonattainment area that are subject to RACT: gas stations and a metal surface coating operation
- RACT submittals are due to EPA by January 1, 2017 and will be submitted separately to EPA by Maricopa and Pinal County when complete

# Reasonably Available Control Measures (RACM) Analysis

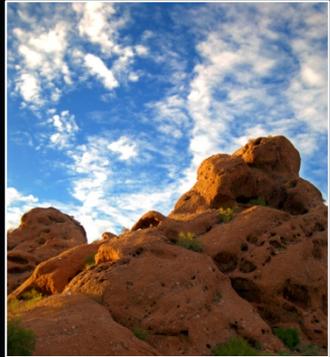
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- **CAA Section 172(c)(1) requires the Moderate Area Plan to include provisions that “shall provide for the implementation of all reasonably available control measures as expeditiously as practicable (including such reductions in emissions from existing sources in the area as may be obtained through the adoption, at a minimum, of reasonably available control technology) and shall provide for attainment of the national primary ambient air quality standards”**
- **Additionally, 40 CFR Section 51.1112(c) requires that “the state shall submit with the attainment demonstration a SIP revision demonstrating that it has adopted all RACM necessary to demonstrate attainment as expeditiously as practicable and to meet any RFP (Reasonable Further Progress) requirements”**
- **RACM is very broad and applies to both stationary and mobile sources**

# Reasonably Available Control Measures (RACM) Analysis

## ENVIRONMENTAL PROGRAMS



- In order to meet RACM requirements, EPA guidance requires a state to adopt all reasonable measures (including RACT) to meet RFP requirements and to demonstrate attainment as expeditiously as practicable
- A state must also demonstrate that there are no additional measures that are reasonably available that will advance the attainment date by at least one year or contribute to RFP
- EPA guidance requires that states should consider “all available measures, including those being implemented in other areas, and that a state must adopt measures for an area only if those measures are economically and technologically feasible and will advance the attainment date or are necessary for RFP”

# Reasonably Available Control Measures (RACM) Analysis

## ENVIRONMENTAL PROGRAMS



- **Over time, the Maricopa nonattainment area has adopted and implemented 93 existing federal, state and local ozone control measures**
- **MAG is working closely with the Maricopa County Air Quality Department on the evaluation of RACM, including the evaluation of EPA's Menu of Control Measures and NOx and VOC rules in other nonattainment areas**
- **Since preliminary modeling indicates that existing nonattainment area measures are sufficient to demonstrate attainment as expeditiously as practicable and meet RFP requirements, no additional or stricter RACM are necessary**
- **Additionally, no additional or stricter RACM will advance the attainment date by one year (July 20, 2017), as the measures would need to be in place by April 1, 2016 at the latest, which is not feasible**

The logo consists of a stylized white mountain range with three peaks of varying heights, set against a dark blue background.

**MARICOPA  
ASSOCIATION of  
GOVERNMENTS**



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