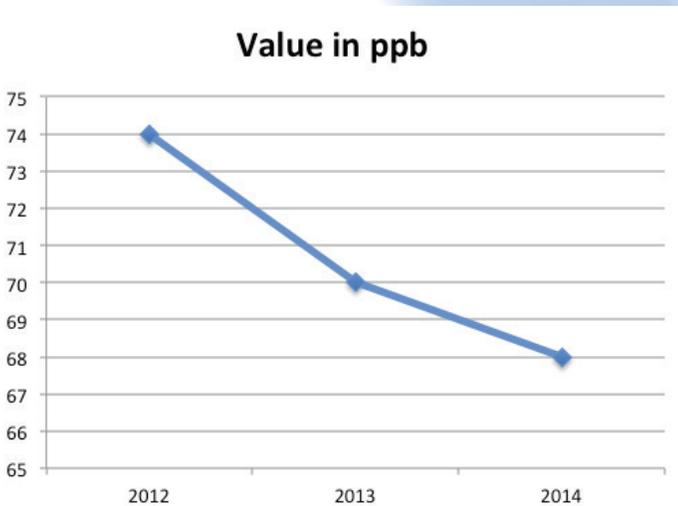


Compliance/Non-Compliance

EPA has proposed revising the National Ambient Air Quality Standard (NAAQS) for ozone from the current limit of 75 parts per billion (ppb) to a more restrictive range of **70 to 65 ppb**. Non-attainment designations are based on three-year averages. Ozone values for the Houma-Thibodaux region for the past three years are:



The average of 70.67 ppb is within the current 75 ppb standard, but would fall slightly outside a 70 ppb standard and farther from a 65 ppb standard.

Non-Attainment Classifications

With previous standards, EPA used a “percent above” to classify non-attainment areas. It is likely a similar approach would be used when the new standard is set. The classifications also establish timeframes for returning to attainment.

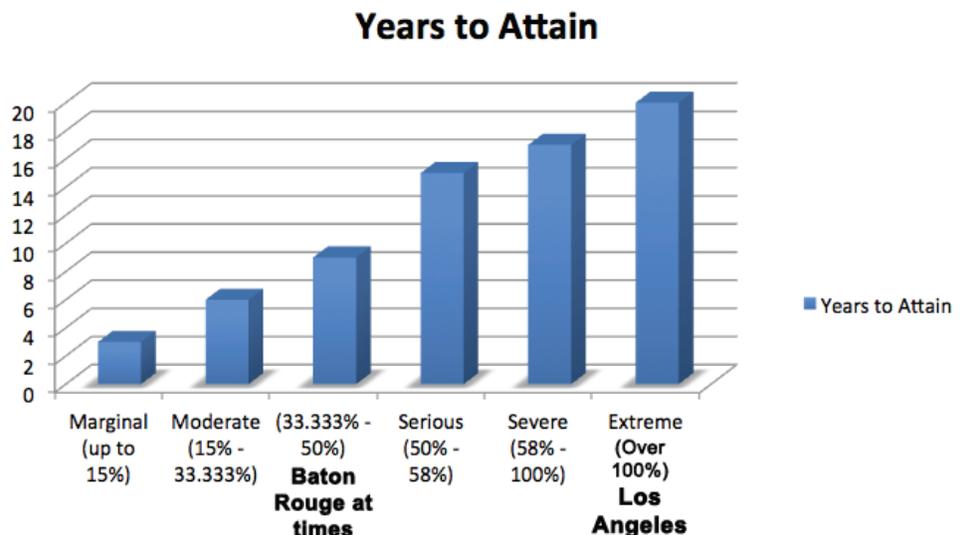
Local Impacts

The further above the standard, the more stringent the emission-

control requirements. Each classification includes all requirements for the one below, plus additional measures. Non-attainment can limit economic activity. Major source facilities (industry) would bear most of their own direct emission-control costs. Applicants with multiple units in the state must demonstrate all are in compliance or on schedule for compliance. Additional requirements and costs may make new industry reluctant to locate in the region. Local communities could also expect effects related to smaller, more difficult to control, area sources, like dry cleaners and filling stations. Mobile sources, like diesel trucks and marine engines, are even harder to control.

Marginal status triggers Transportation Conformity, which requires measuring the amount of pollution road construction would cause and then calculating the emissions from the vehicles that would use the roads.

Moderate status triggers Inspection Maintenance on personal vehicles, with an added annual cost to local residents.



Extreme	Traffic Control During Congestion	
	Clean Fuel Required for Boilers	
Severe	Penalty Fees for Major Sources	
	(VMT) Growth Offset	Low VOC Gas
Serious	Vehicle Miles Traveled Demonstration	
	Enhanced Monitoring	Milestones Contingency Measures
	New Source Review for Existing Source Modifications	
Moderate	Contingency Measures for Failure To Attain	
	Inventory Monitoring	Major Source VOC/NOx RACT*
Marginal	Transportation Conformity	
	Emissions Inventories	New Source Review

*VMT means vehicle miles traveled.

*VOC/NOx means volatile organic compounds and nitrogen oxides, the two compounds that combine to make up ozone.

*RACT means Reasonably Available Control Technologies.

Federal Regulations Air Quality Permits and New Source Reviews

Federal air quality permits are required for construction or modification of any facility that may emit air pollutants. All permit applications undergo New Source Review of emission control, compliance review, alternate site analysis and emission offsets (described below). Permits are scheduled to expire five years from the date of issuance; permit renewals are subject to the same procedural requirements. In non-attainment areas, a more complex review process is triggered when the maximum expected potential emissions for the facility reach certain thresholds. Again, the thresholds

rise with the non-attainment classification.

Permit applicants must show that increased emissions are **offset** by an equal or greater reduction in emissions from the same or other sources in the region (see graphic below). This could mean closing or reducing operations at the other facility.

Reductions must be enforceable (authorized by permit), permanent, quantifiable, real rather than potential, and surplus (over and above what is required by regulation or other State Implementation Plan control strategy).

Offset Ratios (x to 1)

