

Chapter 1 - Introduction



1 INTRODUCTION

1.1 PURPOSE OF THIS PLAN

The San Joaquin Valley Air Basin (SJVAB) does not currently meet the federal primary (health-based) and secondary (welfare-based) one-hour national ambient air quality standards (standards or NAAQS) of 0.12 parts per million (ppm) by volume for the air pollutant ozone. At levels above the federal standards, ozone adversely affects public health, diminishes the production and quality of many agricultural crops, reduces visibility, degrades man-made materials, and damages native and ornamental vegetation.

The San Joaquin Valley Unified Air Pollution Control District (District), which is responsible for air quality management in the SJVAB, has been implementing emissions control measures to reduce 1-hour ozone levels, and has shown demonstrable progress over the past fifteen years. However, additional emission reductions are needed to bring the SJVAB into attainment with the federal 1-hour ozone standards. Because the District has authority over only a portion of the variety of air pollution sources in the SJVAB, it does not have the ability to put in place all of the emissions controls needed to bring the SJVAB into attainment. Additional emission reductions to be implemented by the California Air Resources Board (ARB) and the U.S. Environmental Protection Agency (EPA) are needed to achieve attainment. The Federal Clean Air Act requires that the SJVAB attain the standard by November 15, 2010.¹

This plan was prepared to fulfill the requirements of the Federal Clean Air Act for demonstrating attainment of the federal 1-hour ozone standard by November 15, 2010. As such, it describes the factors contributing to the SJVAB's persistent ozone air quality problem, quantifies air pollutant emissions that cause ozone to form in the SJVAB, identifies control measures (past, present and future) needed to reduce these emissions, and projects future air quality based on implementation of these controls. In addition, this plan fulfills state requirements for the California Clean Air Act Plan Triennial Progress Report and Plan Revision, and fulfills federal requirements for demonstrating rate of progress in meeting emissions reductions targets.

¹ On April 30, 2004 EPA issued a final rule revoking the federal 1-hour ozone standard, effective June 15, 2005 (69 FR 23858). Effective June 15, 2005 the SJVAB would no longer be nonattainment for the federal 1-hour standard and the November 15, 2010 date for attainment would be eliminated. Focus would then shift to the attainment of the 8-hour standard, and District and state emission control measures committed to in this *Extreme OADP* would be implemented for their contribution toward reducing 8-hour ozone levels.

1.2 REGULATORY ASPECTS

1.2.1 Attainment classification

Measured levels of pollutants in the atmosphere determine whether or not a given area is classified as attaining the standards (measured levels are lower than the standards) or nonattainment (measured levels are greater than the standards). For attainment of the federal 1-hour ozone standard, the principal statistic of interest is the number of times measured pollutant levels exceed the ozone NAAQS (also termed the number of exceedances). An area is in compliance with the primary and secondary federal 1-hour ozone NAAQS when measured 1-hour ozone levels at any given station do not exceed on average 0.12 parts per million by volume more than one day per year over any three year period (40 CFR 50.9). Thus an area with four or more exceedances at a given monitor over a three-year period has not attained the standard. Numerous sites in the SJVAB typically experience four or more exceedances, over any given three-year period (see section 2 for details). For the SJVAB to be classified as attainment for the federal 1-hour ozone standard, it would have to have no sites with four or more exceedances over a three-year period.

Once an area is designated as nonattainment for the federal 1-hour ozone standard, an air quality statistic termed the “design value” helps determine the magnitude of the nonattainment problem, as indicated below in Table 1-1 (Section 181(a) of the Federal Clean Air Act):²

**Table 1-1
Nonattainment Classification and Design Value Assignment**

Nonattainment classification	Design Value (ppm)
Marginal	0.121 up to 0.138
Moderate	0.138 up to 0.160
Serious	0.160 up to 0.180
Severe	0.180 up to 0.280
Extreme	0.280 and above

As can be seen, the extreme areas on the bottom have the worst ozone air pollution problem and the highest design value. The “design value” can be thought of as the pollutant concentration in the atmosphere at which we have healthy air for that pollutant. It is the concentration for which we design our air pollution control programs. A design value is calculated for each monitor

² Typically, nonattainment area classification based on design value is done in conjunction with implementing a new standard, such as EPA did in 2004 with the 8-hour ozone standard.

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measuring the pollutant in a given air basin. For the overall basin, the design value is defined as the highest for that basin. For the federal 1-hour ozone standard, the design value is based on the fourth highest exceedance in a 3-year period at a given monitoring station.

Two principal events that have triggered nonattainment area classification based on design value are the passage of the 1990 Federal Clean Air Act Amendments (at which time the above table was created) and in conjunction with implementing a new standard, such as EPA did in 2004 with the new 8-hour ozone standard.

An air basin's nonattainment classification is not always based only on design value. If an area fails to attain the standard by the date given for the classification, EPA can bump up an area to the next highest nonattainment category, if it fails to attain the standard by the date specified in the Federal Clean Air Act, even though the design value may not have changed or may have changed only marginally. An air basin's nonattainment classification can also change by state request in accordance with Section 181(b)(3) of the Federal Clean Air Act. Factors driving such requests include the severity and complexity of a nonattainment problem, the need for emissions controls beyond the authority of the entity responsible for clean air planning, and the types of sources playing key roles in creating high pollutant levels.

1.2.2 Agency responsibilities

The reduction of ozone precursor emissions in the SJVAB requires the cooperation of local, regional, state, and federal governments. At the federal level, the EPA is responsible for setting the NAAQS and establishing federal motor vehicle emission standards. The EPA is also responsible for reducing emissions from locomotives, aircraft, heavy duty vehicles used in interstate commerce, and other sources such as off-road engines that are either preempted from state control or best regulated at the national level. The EPA also has the authority under the FCAA to require preparation of state plans for air quality and may approve or disapprove state air quality plans.

The ARB is the lead state agency for air quality. It is responsible for preparing and submitting a state air quality plan to the EPA. In preparing a state plan, the ARB reviews and approves regional air quality plans and incorporates them into a SIP. Under state authority, ARB also establishes emission standards for on-road motor vehicles and some off-road sources; it also establishes fuel specifications and develops "consumer product" standards for meeting air quality goals in California. Other state agencies such as the Department of Pesticides and the Bureau of Automotive Repair also have responsibility for certain emission sources. The air pollution control districts and air quality management districts are responsible for developing the portion of the SIP that deals with stationary and area source controls in their respective geographic areas; they also cooperate with Regional Transportation Planning Agencies (RTPAs) to develop local government control measures.

1.2.3 Sanctions, FIP and penalties

The FCAA [Title I, Part D, Section 179(b)] directs the EPA to impose sanctions on any area that fails to comply with the requirements of the law. The two mandatory sanctions consist of the following: (1) increased emissions offsets for major stationary sources, and (2) a prohibition on the use of federal highway funds. The offset sanction applies to major stationary sources. In a severe non-attainment area, a major source is defined as any source that emits, or has the potential to emit, 25 tons per year or more of VOC or NO_x. Under the FCAA [Title I, Part D, Section 173(a)], the owner/operator of a major source must obtain construction and operation permits from the District for constructing a new major source or for making a major modification to an existing source. To obtain these permits, the source must reduce emissions within the District by more than the emissions created by the new or modified source on a 1.5 to 1 ratio for extreme areas. If the mandatory offset sanction is imposed, the offset ratio will become 2 to 1, which means that for every one ton of emissions produced, two tons must be reduced from an applicable source in the SJVAB.

The highway construction sanction, when implemented, prohibits the federal Secretary of Transportation from approving or awarding transportation projects or grants, except for projects designed to improve a demonstrated safety problem or intended to minimize air pollution. Air quality exceptions to this sanction include the following types of programs: (1) programs for public transit, (2) bus and high-occupancy lanes, (3) employer trip reduction programs, (4) ramp metering and signalization, (5) parking facilities for multiple occupancy vehicles, (6) road use charges, (7) programs for breakdown and accident scene management, and (8) other programs improving air quality.

In the event that a state is unable to enact emission controls sufficient to attain a federal standard, EPA can promulgate a Federal Implementation Plan (FIP) until such time that state and local planning actions are back on track to achieve attainment. FIPs are not common and are developed on a case-by-case basis as needed. FIPs are not required to meet the same planning deadlines as the SIPs they are temporarily replacing.

1.2.4 Conformity

Conformity requirements date back to the 1977 amendments to the FCAA, but the 1990 FCAA Amendments substantially broadened their coverage and made them more specific. Under the conformity requirements, the Valley RTPAs cannot approve any activity unless it conforms to the SIP's purpose of eliminating the severity and number of violations of the federal standards and achieving expeditious attainment of these standards.

Transportation plans refer to Regional Transportation Plans (RTPs) prepared and adopted by Transportation Planning Agencies. A RTP is normally a 20-year master plan for each county that provides policies, actions, and financial

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projections to guide investment decisions. Transportation programs refer to Transportation Improvement Programs (TIPs). A TIP is a financially constrained set of highway and transit projects to be funded over a multi-year period. It includes all projects requiring federal funding, permits, or other approvals, as well as regionally significant, non-federally funded projects. A transportation project is any highway or transit project that is included in the RTP and TIP, requires federal funding or action, or is regionally significant, and is submitted to the RTPAs for project review and fund application approval.

1.3 SJVAB PLANNING HISTORY

After passage of the 1990 Federal Clean Air Act Amendments, EPA classified the SJVAB as “serious” nonattainment for the federal 1-hour ozone standards, based on the SJVAB’s design value for the 1987—1989 time period of data collection used for the original classification (56 *FR* 56694). As such, the SJVAB was required to attain the standard by November 15, 1999. In accordance with the Federal Clean Air Act, the District prepared and submitted in 1994 a plan demonstrating attainment by the required date.

The SJVAB failed to attain the federal 1-hour ozone standard by November 15, 1999 as required in the Federal Clean Air Act.³ Consequently, in November 2001 EPA reclassified the SJVAB from “serious” to “severe” nonattainment (66 *FR* 56476); at the same time, EPA also changed the boundary of the SJVAB by removing a portion of eastern Kern County, required implementation of six emission control measures from the 1994 Plan, and required submittal by May 31, 2002 of a severe area ozone nonattainment plan meeting the specific provisions of Section 182 (d) of the federal Clean Air Act. In 2002, the District and ARB provided all required items to EPA except for a plan demonstrating attainment of the federal 1-hour ozone standard by November 15, 2005 (rules were submitted in late 2001/early 2002, and a *2002 and 2005 Rate of Progress Plan* was adopted by the District on May 16, 2002 and submitted by ARB to EPA on September 6, 2002)⁴.

On October 2, 2002, EPA issued a final rule specifying “severe” area requirements that had not yet been met for the SJVAB (67 *FR* 61784). These items, which included a plan demonstrating attainment of the federal 1-hour ozone standard by November 15, 2005, were required to be submitted to EPA no

³ The SJVAB’s failure to reach attainment by 1999 is due to a number of factors, including: (1) the emission inventory was not fully developed and understood in 1994, and as a result the attainment strategy did not adequately account for all emissions in the inventory; and (2) emissions from sources outside the District that are transported into the air basin and contribute to exceedances of the ozone standard were not adequately addressed.

⁴ ARB submitted the *2002 and 2005 Rate of Progress Plan* to EPA on September 6, 2002 primarily to incorporate specific enforceable District control measures into the SIP. The motor vehicle emissions inventories in this plan were not used to set conformity budgets because they were based on dated modeling techniques and vehicle activity data not suited for budgets.

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later than March 18, 2004. This EPA action [which was effective on September 18, 2002] triggered an 18-month clock for imposing emissions offset sanctions, a 24-month clock for imposing highway funding sanctions, and a 24-month clock for preparing a Federal Implementation Plan (FIP) for the SJVAB.⁵ Failure to submit the required items by March 18, 2004 would trigger the offset sanctions; failure to submit the required items by September 18, 2004 would trigger the highway fund sanctions and EPA promulgation of the FIP. Stopping the clocks required submittal of the necessary revisions by the dates specified; these revisions are (1) a demonstration of attainment of the 1-hr ozone standard by no later than November 15, 2005 [an ozone attainment demonstration plan (OADP)]; (2) a demonstration of creditable emission reductions of ozone precursors at a rate of at least 3%/yr until November 2005; (3) a rule addressing Reasonably Available Control Technology for lime kilns; (4) an inventory; and (5) contingency measures. In 2003, the District and ARB provided all of the required items to EPA except for the plan demonstrating attainment of the federal 1-hour ozone standard by November 15, 2005.⁶

The District and ARB were unable to provide a Severe Area Ozone Attainment Demonstration Plan to EPA because the magnitude of the emissions reductions needed to attain the standard could not be put in place in time to show attainment by November 15, 2005. Photochemical modeling conducted in 2001 identified large emissions reductions needed for attainment. The magnitude of the reductions was outside of the District's regulatory authority to implement; consequently, attainment depended upon ARB's implementation of their own emission control measures on sources outside the authority of the District to regulate (primarily mobile sources). Most of ARB's rules were scheduled to go into effect in the post 2007 time frame⁷, which did not help the District demonstrate attainment for the SJVAB by 2005. In addition, EPA was developing regulations to reduce emissions from sources under their control (e.g., locomotives, aircraft, diesel engines, etc.), but the federal implementation schedule for these rules was in the post-2005 time frame.

⁵ Under the Federal Clean Air Act, EPA may develop and implement its own federal emission control measures if it finds that state and local measures do not meet requirements. This Federal Implementation Plan (FIP) is thus a temporary activity that supersedes the State Implementation Plan; it remains in effect until such time as EPA turns the attainment demonstration program back to state and local agencies.

⁶ On April 10, 2003, California submitted to EPA the District's *Amended 2002/2005 Rate of Progress (ROP) Plan for San Joaquin Valley Ozone*, which provides all of the severe area SIP revisions required by EPA in the October 2002 *Federal Register* notice, except for the OADP. This Amended ROP Plan is based on ARB's updated motor vehicle emissions model and updated activity data, and thus could be used to set conformity budgets. On July 10, 2003 EPA found the conformity budgets to be adequate. On September 4, 2003, EPA found the *Amended ROP Plan* to be complete, and it is under review at EPA as of July 2004.

⁷ ARB's rulemaking activities are heavily influenced by the attainment planning schedule for the South Coast Air Basin, which as an extreme ozone nonattainment area must attain the federal 1-hour ozone standard by November 15, 2010.

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The District and the California Air Resources Board (ARB) have acknowledged that emission reductions stemming from state and federal controls (which are outside of the District's authority to implement) are needed to demonstrate attainment of the 1-hr ozone standards in the SJVAB, and that these controls will not go into effect until after 2005. The District needed a mechanism to allow time for state and federal measures to come into effect in order to attain the standard. Since the District could not accelerate implementation of state and federal measures, other options were explored. Section 181(b)(3) of the Federal Clean Air Act allows states to request EPA to reclassify an area to a higher classification. Higher classes reflect a more substantial nonattainment problem that in turn requires more time to solve. The District's only option for pursuing a higher classification, with a later attainment date, was to request classification as extreme nonattainment.⁸

The District held numerous workshops and other public discussions (e.g., staff reports at Governing Board meetings) during the period 2001—2003 on the subject of requesting EPA to reclassify the SJVAB as extreme nonattainment for the federal 1-hour ozone standards. Consequently, on December 18, 2003, after extensive public debate and stakeholder discussion, the District's Governing Board voted unanimously to request EPA through ARB to classify the SJVAB as extreme nonattainment for the federal 1-hour ozone standards.

ARB forwarded this request to EPA on January 9, 2004. On February 23, 2004 EPA proposed approval of the request (69 FR 8126) and on April 18, 2004, EPA signed the final rule approving the request. The classification as extreme nonattainment became final on May 17, 2004 (69 FR 20550). This classification changes the SJVAB's attainment date for the federal 1-hour ozone standard to November 15, 2010, thereby providing time for critical state and federal emissions controls to come into effect in the post-2005 time frame. The classification to extreme also removes all prior "severe" area requirements and associated sanctions and FIP clock because once a nonattainment area is reclassified, the Federal Clean Air Act requirements of the new classification supersede those of the previous classification, and the previous attainment requirements (and any associated deficiencies) are moot (69 FR 8127). No sanctions or FIP clock for planning deficiencies for the Federal 1-hour ozone standard apply to the SJVAB as of May 17, 2004.

⁸ In May 2001, The District requested EPA to designate the SJVAB as "Severe-17", which would have extended the attainment date to November 15, 2007. In November 2001, EPA denied the request because the "Severe-17" category can be assigned based only on design value, and the SJVAB's 1-hour design value at the time of the request was not high enough for classification as "severe-17." (66 FR 56476)

1.4 EXTREME AREA REQUIREMENTS

Extreme nonattainment areas must meet all requirements specified in Section 182(d) of the FCAA for a “severe” area plan plus the requirements for extreme areas specified in Section 182(e). Table 1-2 describes OADP requirements for severe vs. extreme nonattainment areas.

Under a classification of extreme nonattainment, the District must submit an attainment plan that demonstrates attainment of the standard by the November 15, 2010. A new ROP Plan is also due that demonstrates that the District met the additional 3% per year reduction for the 2008 and 2010 ROP milestones. The Federal Clean Air Act allows extreme areas to put emissions reductions needed for attainment in a category of long-term measures; if an extreme plan uses this provision states must identify specific emission control measures for these reductions no later than November 15, 2007 [Section 182(e)(5)]. The \$5000 per ton fee rule would not be implemented unless the SJVAB failed to attain the standard in 2010.⁹

The federal Clean Air Act requires extreme nonattainment areas to define a major source as one whose emissions of ozone precursors meet or exceed 10 tons per year. The lower major source definition also affects implementation of two other programs: New Source Review (NSR) and Title V permitting. The lower major source threshold under extreme requires an estimated 150 more sources to obtain Title V permits¹⁰(exclusive of agricultural sources). For NSR, the lower major source threshold is expected to have a minimal effect on SJVAB sources because the District’s NSR program requirements already meet “extreme” levels (10 tons per year) due to California Clean Air Act requirements. The offset ratio would go from 1:3:1 for severe areas to 1:5:1, with the option of a 1:2:1 ratio if the District is able to demonstrate use of best available control technology on all major sources. The Final Rule reclassifying the SJVAB to extreme nonattainment (69 *FR* 20550) requires submittal of revised NSR and Title V rules reflecting a classification of extreme nonattainment to EPA by May 16, 2005.¹¹

⁹ The District’s Governing Board adopted a rule implementing a \$5000/ton fee for the SJVAB as a severe area on May 16, 2002. The District submitted the adopted rule to EPA for inclusion in the SIP. As of July 2004, EPA had not taken final action on the rule. This rule, if triggered by nonattainment, would generate an estimated \$4 million to \$ 36 million per year, but federal law does not mandate how the funds should be spent.

¹⁰ The District issues permits to about 7000 facilities, exclusive of agricultural operations.

¹¹ EPA’s Phase I Final Rule implementing the federal 8-hour ozone standard specifies that NSR thresholds are growth measures that change with an area’s classification. Under its 8-hour classification of “serious”, the SJVAB’s NSR threshold would then go to 50 tons/year; however, state law prevents increasing NSR thresholds above levels in effect as of December 30, 2002. Consequently, after revocation of the 1-hour standard, the District’s threshold is likely to stay at the “severe” level of 25 tons/year.

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TABLE 1-2 Requirements for Severe vs. Extreme Nonattainment Areas [FCAA Sections 182(d) and (e) and section 185]		
Requirement Category	Severe Area Provisions	Extreme Area Provisions
Major Stationary Source	Includes any stationary source or group of sources located within a contiguous area and under common control that emits, or has the potential to emit, at least 25 tons per year of VOCs or NOx.	Includes any stationary source or group of sources located within a continuous area and under common control that emits, or has the potential to emit, at least 10 tons per year of VOCs or NOx.
Modifications to Sources	Not applicable	Any change at a major stationary source that results in any increase in emissions from any discrete operation, unit, or other pollutant-emitting activity at the source shall be considered a modification from the standpoint of permit requirements unless the increase is offset by reductions in the same pollutant from other discrete operations within the same source at an offset ratio of at least 1.3 to 1.
Clean Fuels/Advanced Control Technologies for Boilers	Not applicable	Extreme areas shall submit plan revisions that require each new, modified, and existing electric utility and industrial/commercial boiler emitting >25 tons per year of NOx to burn as its primary fuel, natural gas, methanol, or ethanol or use advanced technology for reducing NOx emissions.
Traffic Control Measures	Not applicable	Extreme plans may contain provisions establishing traffic control measures applicable during heavy traffic hours to reduce the use of heavy-duty or high-polluting vehicles.
New Technologies	Not applicable	EPA may approve extreme area SIP provisions that anticipate development of new control techniques or improvement of existing control technologies, and attainment based on these provisions, if the state can demonstrate that such provisions are not needed to achieve the emission reductions in the 1990—2000 time frame and if the state has submitted enforceable commitments to develop and adopt contingency measures to be implemented if the new technologies do not produce the intended emission reductions.
Offset Requirement	Emission offset requirement is at least 1.3 to 1 for new or modified sources as the ratio of total emission reductions of VOCs to total increase emissions of such air pollutants, except if all existing major sources in the nonattainment area use best available control technology for the control of VOCs and NOx, the ratio remains at least 1.2 to 1.	The ratio of total emission reductions of VOCs to total increased emissions of such air pollutant shall be at least 1.5 to 1, except that if the State plan requires all existing major sources in the nonattainment area to use best available control technology for the control of volatile organic compounds, the ratio shall be at least 1.2 to 1.
Failure to attain fee	If area fails to attain the standard by November 15, 2005, major stationary source of VOCs in the area shall pay a fee to the state of \$5000/ton of VOC emissions per calendar year in excess of 80% of a baseline defined as the actual or allowable emissions.	Same requirements except for attainment date of November 15, 2010.

1.5 PLAN DEVELOPMENT

1.5.1 Process

In June 2002, recognizing the likelihood of eventually requesting classification to extreme nonattainment, the District Governing Board directed staff to begin preparation of a plan that demonstrates attainment of the federal one-hour ozone standard by November 15, 2010. Work on the *Extreme OADP* has been ongoing since June 2002; most of the initial effort was directed at preparing the *Amended 2002 and 2005 Rate of Progress Plan for San Joaquin Valley Ozone*. Consequently work focused on updating emissions inventories and control measures, and examining emissions trends over time.

Independent of the *Ozone Rate of Progress Plan*, work was also ongoing in this time frame on analysis of meteorological and atmospheric chemistry data collected during the summer 2000 Central California Ozone Study (CCOS). This data analysis supported selection of ozone episodes from the summer of 2000, and the simulation of ozone levels for the episodes as the basis for attainment demonstrations in the *Extreme OADP*. The District and ARB developed this *Extreme OADP* with the best CCOS information available through March 2004. As CCOS work continues and new information becomes available, it will be incorporated into future revisions of the *Extreme OADP* or in future plans for attaining the federal 8-hour ozone standard. At a minimum, the District is committed to revising the *Extreme OADP* in 2007 (assuming EPA is still requiring states to conduct planning activities for the federal 1-hour ozone standard, which they plan to revoke in June 2005); this revision would include data analysis and modeling work conducted from March 2004 through late 2006. If the *Extreme OADP* is not revised in 2007, any updated analyses and control measure evaluations would be presented in the 8-hour ozone attainment demonstration plan that is due to EPA by June 15, 2007.

Section 6 provides more information on the public process used to develop this *Extreme OADP*. The District conducted public workshops on the *Extreme OADP* in July 2003, January 2004, and in August 2004. Monthly coordination meetings among District staff, ARB, and the transportation planning agencies helped guide the plan development over the 2003—2004 time period. Many regularly scheduled technical meetings among staff from ARB and other districts addressed emissions inventory and photochemical modeling issues (see Section 5 for more information).

1.5.2 Schedule

In its final rule reclassifying the SJVAB to extreme nonattainment, EPA specified a due date of November 15, 2004 for the SJVAB *Extreme OADP* (69 FR 20550). This rule became effective on May 17, 2004¹². The current schedule calls for a preliminary draft *Extreme OADP* to be released to the public in summer 2004, followed by workshops in mid-to-late summer, 2004. The District Governing Board would consider the *Extreme OADP* for adoption in the fall of 2004. Following adoption, the *Extreme OADP* would be sent to ARB for approval and then on to EPA by November 15, 2004.

1.5.3 Content

This *Extreme OADP* is organized into the following sections. Section 2 presents an overview of SJVAB ozone air quality, including air quality monitoring data, air quality determinants, ozone effects, and trends in ozone air quality. Section 3 presents the planning emissions inventories used as the foundation for this plan. Current and future emission control measures are discussed in Section 4. Section 5 is the heart of this *Extreme OADP*, and uses emissions and air quality data to project future air quality and provide the basis for projecting future attainment of the federal 1-hour ozone standard. Section 6 summarizes public outreach conducted during plan development, while Section 7 fulfills Rate of Progress requirements in the federal Clean Air Act. Section 8 is included to meet separate State of California requirements for a triennial progress report and California Air Quality Attainment Plan revision, and Section 9 defines acronyms and other terms used throughout the document. Lastly, a series of appendices performs two important functions: presenting detailed and technical information that supports the plan, and allowing the main body of the plan to be shorter and easier to understand for the lay audience.

¹² In its Final Phase I Rule implementing the federal 8-hour ozone standard, EPA specified that unmet obligations for 1-hour attainment plans could be met using one of three options, any of which would be due on June 15, 2005 (69 FR 23998). One of the options is to prepare a 1-hour ozone attainment demonstration plan. The Final Phase I Rule for 8-hour ozone became effective on June 15, 2004. As of July 2004 this apparent discrepancy in due dates for the SJVAB's 1-hour ozone attainment demonstration plan has not been clarified.

