Section 4: Maintenance Demonstration

4.1 Demonstration Requirement

The maintenance plan must demonstrate that the area will remain in compliance with the 8-hour ozone standard for the ten (10) year period following the effective date of designation. The end projection year for the maintenance plan is ten (10) years from the effective date of the attainment designation. The maintenance demonstration is satisfied if the state demonstrates that future emissions inventories are less than the attainment or baseline inventory. St. Mary Parish has an effective date of designation of June 15, 2004, which means that maintenance must be demonstrated through 2014.

The state has identified the level of precursor emissions in St. Mary Parish that is sufficient to attain the NAAQS, i.e. the 2002 attainment inventory, and established interim emission projections of ozone precursors for the years 2008, 2011 and 2014 to demonstrate maintenance. A comparison of emission growth projections for NOx through 2014 to the 2002 attainment inventory for the parish reflects an insignificant increase, while the same comparison for VOC reflects compliance with the 8-hour NAAQS. (See Tables 3-2 and 3-3)

4.2 Plan to Maintain Air Quality

The state has implemented enforceable emission control regulations to ensure continued maintenance of the ozone standard. Control measures have also been developed, promulgated and implemented at the federal level to reduce ozone-forming emissions of VOC and NOx. Development and subsequent implementation of other federal measures will result in additional emission reductions of VOC and NOx during the 10-year maintenance period. Federal measures which have been implemented or are currently in some phase of implementation include, but are not limited to:

- National VOC Emission Standards for Automobile Refinish Coatings (63 FR 48806)
- National VOC Emission Standards for Consumer Products (63 FR 48819)
- National VOC Emission Standards for Architectural Coatings (63 FR 48848)
- Tier 2 Motor Vehicle Emission Standards and Gasoline Sulfur Control Requirements (65 FR 6697)
- Heavy-Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements (66 FR 5002)
- Control of Emissions from Nonroad Diesel Engines and Fuels (69 FR 38958)
- Clean Air Interstate Rule (70 FR 25162)

4.3 Other Methods to Demonstrate Maintenance

EPA guidance indicates that maintenance may be demonstrated using other methods such as modeling. Updated EPA modeling conducted for the Clean Air Interstate Rule (CAIR) demonstrates that implementation of CAIR in subject states will result in continued maintenance or attainment with the ozone standard, including some nonattainment areas achieving attainment. Louisiana is a state which must implement CAIR and the CAIR modeling indicates that all Louisiana parishes will be in attainment with the 8-hour ozone standard by 2010 with continued attainment to 2015. Therefore based on EPA CAIR modeling, St. Mary Parish is expected to maintain attainment with the current 8-hour ozone for the duration of the maintenance period.