

SIP SUBMITTAL COMPLETENESS CRITERIA CHECKLIST

(in accordance with 40 CFR Part 51 - App. V)

SIP Submitted by: Virginia Department of Environmental Quality (VDEQ)
 Date Submitted: September 18, 2006, September 20, 2006, September 25, 2006, November 17, 2006, and February 13, 2007
 Subject: Redesignation of the Richmond 8-Hour Ozone Nonattainment Area to Attainment and Approval of the Area's Maintenance Plan and 2002 Base-Year Inventory.

Completeness Review

Completed by: Amy Caprio
 Date Completed: February 27, 2007

Administrative Materials

ACCEPTABLE

EPA REQUIREMENT	STATE SUBMITTAL	(X)
1. A formal letter of submittal from the Governor or his designee, requesting EPA approval of the plan or revision thereof.	1. Letters were submitted September 18, 2006, September 20, 2006, September 25, 2006, November 17, 2006, and February 13, 2007 on behalf of the Commonwealth of Virginia from David K. Paylor, Director, VDEQ to Judith M. Katz, Director of Air Quality, EPA Region III.	X
2. Evidence that the State has adopted the plan in the State code or body of regulations; or issued the permit, order, consent agreement in final form. That evidence shall include the date of adoption or final issuance as well as the effective date of the plan, if different from the adoption/issuance date.	2. N/A (Not a regulatory change the submittal is request for resesignation, a maintenance plan, and a 2002 base-year emissions inventory that is effective September 15, 2006).	X
3. Evidence that the State has the necessary legal authority under State law to adopt and implement the plan.	3. VA has SIP authority under section 10.1-1307.2 A of the Virginia Air Pollution Control Law.	X
4. A copy of actual regulation, or document submitted for approval and incorporation by reference into the plan, including indication of the changes made to the existing approved plan, where applicable. The submittal shall be a copy of the official State regulation/document signed, stamped,	4. N/A See number 2 above.	X

EPA REQUIREMENT	STATE SUBMITTAL	(X)
dated by the appropriate State official indicating that it is fully enforceable by the State. The effective date of the regulation/document shall, whenever possible, be indicated in the document itself.		
5. Evidence that the State followed all of the procedural requirements of the State's laws and constitution in conducting and completing the adoption/issuance of the plan.	5. N/A	X
6. Evidence that public notice was given of the proposed change consistent with procedures approved by EPA, including the date of publication of such notice.	6. VDEQ provided proof that the notice of public hearing was published in the Richmond <u>Times Dispatch</u> on July 21, 2006.	X
7. Certification that public hearings were held in accordance with the information provided in the public notice and the State's laws and constitution, if applicable.	7. As required by section 2.1(g) of Appendix V of 40 CFR Part 51, the hearing was held in accordance with the information found in the public notice (<u>Times Dispatch</u> , July 21, 2006), and according to the State's laws.	X
8. Compilation of public comments and the State's response thereto.	8. The state submittal includes a compilation of public comments and responses thereto.	X
1. Identification of all regulated pollutants affected by the plan.	1. Yes	X
2. Identification of the locations of affected sources including the EPA attainment/nonattainment designation of the locations and the status of the attainment plan for the affected area(s).	2. Applies to the Cities of Petersburg, Colonial Heights, Hopewell, and Richmond, and the Counties of Prince George, Chesterfield, Hanover, Henrico, and Charles City (The Richmond Nonattainment Area).	X
3. Quantification of the changes in plan allowable emissions from the affected sources; estimates of changes in current actual emissions from affected sources or, where appropriate, quantification of changes in actual emissions from affected sources through calculations of the differences between certain baseline levels and allowable emissions anticipated as a result of the revision.	3. Detailed information on the point, area and mobile source emissions estimates used in the request for redesignation to attainment, the ozone maintenance plan, and the 2002 base-year emission inventory for the Richmond Area. Information is provided on growth factors used to project emission inventories as well as methods used to determine the growth factors.	X
4. The State's demonstration that the national ambient air quality standards, prevention of significant deterioration	4. The state has developed a current and projected (2005-2018) emissions inventory showing attainment of the national	X

EPA REQUIREMENT	STATE SUBMITTAL	(X)
increments, reasonable further progress demonstration, and visibility, as applicable, are protected if the plan is approved and implemented.	ambient air quality standard (NAAQS). This inventory took into account multiple factors such as; growth rates, implementation of programs throughout the Area, and the level of emissions sufficient to achieve the NAAQS.	
5. Modeling information required to support the proposed revision, including input data, output data, models used, ambient monitoring data used, meteorological data used, justification for use of offsite data (where used), modes of models used, assumptions, and other information relevant to the determination of adequacy of the modeling analysis.	5. Virginia included information from a modeling exercise done by the Association for Southeastern Integrated Planning (ASIP) and the Ozone Transport Commission (OTC) for the monitors in the Richmond Area.	X
6. Evidence, where necessary, that emission limitations are based on continuous emission reduction technology.	6. N/A	X
7. Evidence that the plan contains emission limitations, work practice standards and recordkeeping/reporting requirements, where necessary, to ensure emission levels.	7. Evidence is shown that VDEQ will do periodic emissions inventory updates and analysis.	X
8. Compliance/enforcement strategies, including how compliance will be determined in practice.	8. Contingency measures will be implemented if the Richmond Area exceeds the NOx and VOC regional emissions budget or if there is an 8-hour ozone violation at any of the Richmond Area monitors. These measures are meant to bring the Area back to attainment of the 8-hour ozone standard.	X
9. Special economic and technological justifications required by any applicable EPA policies.	9.N/A	X
10. A Section 107 request must be accompanied by a maintenance plan demonstrating maintenance to the relevant NAAQS for at least 10 years after redesignation.	10. Maintenance Plan was submitted to EPA Region III on September 25, 2006. This plan demonstrates maintenance for 2005-2018.	X