

redesignation to attainment. Eight years after the redesignation, the State must submit a revised maintenance plan which demonstrates attainment for the 10 years following the initial 10-year period. To address potential future NAAQS violations, the maintenance plan must contain contingency measures, with a schedule for implementation adequate to assure prompt correction of any air quality problems.

Section 175A(d) requires that the contingency provisions include a requirement that the State will implement all control measures that were in the SIP prior to redesignation as an attainment area.

An ozone maintenance plan should address the following five elements: attainment inventory, demonstration of maintenance, monitoring network, verification of continued attainment, and a contingency plan.

Attainment Inventory

On November 13, 2001 (66 FR 56931), EPA approved Wisconsin's one-hour ozone attainment demonstration for the Milwaukee area, Manitowoc County and Door County. The approved demonstration shows modeled attainment in 2007. Consequently, Wisconsin must use 2007 as the attainment year for Manitowoc and Door Counties. The State has developed an attainment inventory by projecting the 1999 baseline emission inventory described above to 2007 using growth factors and control factors.

The attainment level of emissions are summarized in the tables below:²

TABLE 6.—DOOR COUNTY 2007 ATTAINMENT INVENTORY—VOC AND NO_x

[tons per day]		
Sector	VOC	NO _x
Point	0.17	0.02
Area	2.62	0.36
Non-Road Mobile	3.96	1.05
Mobile	1.20	2.03
Total	7.94	3.46

² Any discrepancies between the table totals and the sum of their constituent values are due to rounding conventions. The sector totals were actually figured to three decimal places, summed, and then rounded to two decimal places to obtain the total emissions.

TABLE 7.—MANITOWOC COUNTY 2007 ATTAINMENT INVENTORY—VOC AND NO_x

[tons per day]		
Sector	VOC	NO _x
Point	2.23	3.08
Area	6.53	1.11
Non-Road Mobile	1.70	2.46
Mobile	3.12	6.33
Total	13.58	12.98

Demonstration of Maintenance

In order to demonstrate continued attainment for ten years after EPA approves the redesignation, the State was required to develop inventories for 2007 and 2013. The 2007 attainment inventory was projected from the 1999 baseline inventory using growth and control factors. To demonstrate maintenance, the state initially projected the 1999 inventory to 2012, using the same methodology. Subsequently, due to a delay in submitting the redesignation request, an inventory was needed for 2013 to demonstrate maintenance for a full ten years after redesignation. For all sectors except highway mobile, the state assumed annual growth between 2012 and 2013 to be equivalent to the average annual growth between 2007 and 2012 by type sector. For highway mobile emissions, the state used the MOBILE6 model and assumed growth in vehicle miles traveled (VMT) between 2012 and 2013 to be equivalent to the average VMT growth between 2007 and 2012.

These emission estimates are presented in the tables below and demonstrate that VOC and NO_x emissions will decrease in future years.³ The results of this analysis show that the area is expected to maintain the air quality standard for at least ten years into the future.

TABLE 8.—DOOR COUNTY VOC MAINTENANCE EMISSION INVENTORY SUMMARY

[tons per day]		
Sector	2007	2013
Point	0.17	0.18
Area	2.62	2.83
Non-Road Mobile	3.96	3.68
Mobile	1.20	0.74
Total	7.94	7.44

³ Any discrepancies between the table totals and the sum of their constituent values are due to rounding conventions. The sector totals were actually figured to three decimal places, summed, and then rounded to two decimal places to obtain the total emissions.

TABLE 9.—DOOR COUNTY NO_x MAINTENANCE EMISSION INVENTORY SUMMARY

[tons per day]		
Sector	2007	2013
Point	0.02	0.02
Area	0.36	0.36
Non-Road Mobile	1.05	1.09
Mobile	2.03	1.17
Total	3.46	2.64

TABLE 10.—MANITOWOC COUNTY VOC MAINTENANCE EMISSION INVENTORY SUMMARY

[tons per day]		
Sector	2007	2013
Point	2.23	2.45
Area	6.53	6.69
Non-Road Mobile	1.75	1.47
Mobile	3.12	1.89
Total	13.62	12.50

TABLE 11.—MANITOWOC COUNTY NO_x MAINTENANCE EMISSION INVENTORY SUMMARY

[tons per day]		
Sector	2007	2013
Point	3.08	3.30
Area	1.11	1.12
Non-Road Mobile	2.41	2.45
Mobile	6.33	3.59
Total	12.93	10.47

The emission projections show that the emissions are not expected to exceed the level of the 2007 attainment year inventory during the 10-year maintenance period. In Door County, VOC and NO_x emissions are projected to decrease by 0.5 tons per day and 0.82 tons per day, respectively. In Manitowoc County, VOC and NO_x emissions are projected to decrease by 1.12 tons per day and 2.46 tons per day, respectively.

Monitoring Network

Wisconsin currently operates one ozone monitor in Door County and two ozone monitors in Manitowoc County. The WDNR has committed to continue operating and maintaining an approved ozone monitor network in both counties through the maintenance period and beyond.

Verification of Continued Attainment

Tracking—Continued attainment of the ozone NAAQS in Manitowoc and Door Counties depends, in part, on the