

Appendix A**Comparison of Subpart 1 & 2 Requirements**

This is only an outline of the general requirements of subparts 1 and 2 and should not be relied on for regulatory purposes.

Element	Subpart 1	Subpart 2	
		Classification	Requirement
Attainment Dates: For all areas, attainment should occur as expeditiously as practicable, but no later than specified timeframe.	Up to 5 years after nonattainment designation; may extend up to 10 years based on specified considerations.	Marginal	3 years from CAA Amendments enactment.
		Moderate	6 years from CAA Amendments enactment.
		Serious	9 years from CAA Amendments enactment.
		Severe-15	15 years from CAA Amendments enactment.
		Severe-17	17 years from CAA Amendments enactment.
		Extreme	20 years from CAA Amendments enactment.
RFP	"Annual incremental emissions reductions".	Marginal	None.
		Moderate	15% VOC reduction from baseline within 6 years of enactment.
		Serious	Moderate req't plus 9% VOC/NO _x reductions for years 7–9 after CAA Amendments enactment.
		Severe-15	Serious req't plus 9% VOC/NO _x for years 9–15 after CAA Amendments enactment.
		Severe-17	Serious req't plus 9% VOC/NO _x for years 9–17 after CAA Amendments enactment.
		Extreme	Severe req't plus 9% VOC/NO _x for years 9–20 after CAAA enactment.
Milestone Compliance Determination.	Not required as such; contingency measures supposed to be implemented upon failure to meet RFP.	Marginal/moderate	No further requirement.
		Serious & above	Requires milestone compliance demonstration to be made following milestone; failing area must elect one of the following: 1. bump-up. 2. implement contingency measures. 3. economic incentive.
Attainment demonstration submission.	EPA sets date which can be no later than 3 years after designation.	Marginal	None.
		Moderate	Due 3 years after CAA Amendments enactment.
		Serious	Due 4 years from CAA Amendments enactment.
		Severe	Due 4 years from CAA Amendments enactment.
		Extreme	Due 4 years from CAA Amendments enactment.
NSR and RACT major source applicability.	100 TPY	Marginal	100 TPY
		Moderate	100 TPY
		Serious	50 TPY
		Severe	25 TPY
		Extreme	10 TPY
NSR offsets	>1 to 1	Marginal	1.1 to 1
		Moderate	1.15 to 1
		Serious	1.2 to 1
		Severe	1.3 to 1
		Extreme	1.5 to 1