

ENVIRONMENTAL PROTECTION
AGENCY

40 CFR Part 80

[FRL-5917-7]

RIN 2060-AH43

Fuels and Fuel Additives; Elimination
of Oxygenated Fuels Program
Reformulated Gasoline (OPRG)
Category From the Reformulated
Gasoline Regulations

AGENCY: Environmental Protection
Agency.

ACTION: Final rule.

SUMMARY: In this action, the reformulated gasoline (RFG) regulations are amended to eliminate the separate treatment for a category of gasoline used in oxygen averaging. This category, oxygenated fuels program reformulated gasoline (OPRG), includes reformulated gasoline intended for use in a state oxygenated fuels program during the winter time. Under the current RFG regulations, a refiner must meet the oxygen content standards on average for the entire pool of gasoline they produce, and for the pool of gasoline they produce that is non-OPRG. EPA is taking this action because it no longer believes a distinction between OPRG and RFG that is not intended for oxygenated fuels program areas (i.e., non-OPRG) is necessary and because removal of the OPRG category would add flexibility and reduce compliance costs for regulated parties, without producing a negative environmental impact. Today's rule also removes a prohibition on adding oxygen to finished RFG, which will provide parties in RFG/oxygenated fuels program overlap areas with added flexibility in meeting both programs' standards.

EFFECTIVE DATE: November 3, 1997.

FOR FURTHER INFORMATION CONTACT:
Anne-Marie C. Pastorkovich at (202)
233-9013.

SUPPLEMENTARY INFORMATION:

I. Regulatory Entities

Regulatory categories and entities potentially affected by this action include:

Category	Examples of regulated entities
Industry	Refiners, importers, oxygenate blenders of reformulated gasoline.

This table is not intended to be exhaustive, but rather provides a guide

for readers regarding entities likely to be regulated by this action. This table lists the types of entities that EPA is now aware could be potentially regulated by this action. Other types of entities not listed in the table could also be regulated. To determine whether your entity is regulated by this action, you should carefully examine the existing provisions at 40 CFR 80.2, 80.65, 80.67, 80.69, 80.75, 80.77, 80.78, and 80.128, dealing specifically with OPRG. If you have questions regarding the applicability of this action to a particular entity, consult the person listed in the preceding **FOR FURTHER INFORMATION CONTACT** section.

II. Background

On March 17, 1997, EPA proposed amendments to the reformulated gasoline (RFG) regulations that would eliminate the oxygenate program reformulated gasoline (OPRG) category.¹ As explained in that notice, EPA issued the proposed rule for several reasons. First, between 1993, when the final RFG rule was issued, and 1995, when the RFG program was implemented, the number of overlapping oxygenated fuels program and RFG areas significantly decreased. Although EPA is concerned that the statutory mandate for 2.0 weight percent oxygen for RFG is met,² the Agency feels that the specific risk of uneven RFG quality due to overlapping oxygenated fuels/RFG program areas is significantly less than was expected when the RFG regulations were promulgated. There is still some risk that an area might receive relatively low oxygen RFG because of averaging, but the risk is no longer as likely to be specifically caused by program overlap as in 1993 and 1994.

Second, based upon EPA estimates made prior to the beginning of the first year of the RFG program, approximately one-third (33%) of all gasoline nationwide was predicted to be RFG. Oxygenated fuels program overlap areas outside of California accounted for approximately one-third (33%) of the total RFG pool, with approximately 19% going to the New York CMSA.³ EPA

¹ 62 FR 12586 (March 17, 1997).

² In oxygenated fuels program areas implemented by states as required by section 211(m) of the Act, the minimum oxygen content during the winter control period is 2.7 weight % oxygen. This minimum for oxygenated fuels control periods is unaffected by today's rule and remains in force. Nothing in today's rule changes the applicable oxygen standards under the Federal RFG or state oxygenated fuels programs.

³ It should be noted that, since these estimates were made in 1994, some areas have opted out of the RFG program and Sacramento, California joined the program as a required covered area, and comparative volume totals will have changed

believes that any risk that an area might receive low oxygen RFG is significantly less than it appeared in 1993 and 1994. As discussed in great detail in the proposed rule,⁴ in 1994, roughly one-third of RFG was expected to be destined for several oxygenated fuels overlap cities outside of California. Today, the New York City CMSA is the only remaining overlap area outside California, although the Phoenix, Arizona moderate ozone nonattainment area opted into the RFG program⁵ and is also an oxygenated fuels area. EPA continues to believe that the risk that an area might receive low oxygen RFG can be adequately addressed through another existing compliance mechanism—the RFG surveys required by 40 CFR 80.68.

III. Response to Comments

Effective Date: Three commenters wanted the rule to go into effect by the November 1, 1997, the start date for the 1997–1998 winter oxygenated fuels program. A fourth commenter wanted the rule to go into effect “as expeditiously as due process considerations allow.” The rationale for the earliest effective date is to allow regulated parties to take advantage of maximum flexibility.

However, another commenter urged EPA to implement the change effective January 1, 1998, in order to alleviate financial burdens on certain regulated parties. Specifically, companies may have entered into contracts under which they have already paid for credits needed this year. An implementation date earlier than January 1, 1998 would, according to the commenter, devalue those purchased credits without the possibility of a refund to the purchaser.

EPA believes that the rule should go into effect by November 1, 1997, concurrent with the start of the oxygenated fuels program, in order to

somewhat as a result. These estimates are not based upon the comparative volume of OPRG to RFG. Rather, they are “straight” estimates of a program area's share of the total RFG “pool” and are not broken down into compliance categories. The reader should be aware that OPRG gasoline likely represents a smaller, subset of the total volume represented for each area. The untitled document from which the volume estimates were taken has been placed in the public docket, docket # A-97-01, Category II(B). The docket is located at the Air Docket Section, 401 M Street, SW, Room M-1500 Washington, DC and is open Monday through Friday from 8:00 a.m. to 5:30 p.m.

⁴ 62 FR 12596, 12588.

⁵ “Regulation of Fuels and Fuel Additives: Extension of the Reformulated Gasoline Program to the Phoenix, Arizona Moderate Ozone Nonattainment Area,” 62 FR 30260 (June 3, 1997). The Arizona opt-in became effective on July 3, 1997 for all persons other than retailers and wholesale purchaser-consumers and August 4, 1997 for retailers and wholesale purchaser-consumers.

allow regulated parties maximum flexibility. A January 1, 1998 start date falling in the middle of the state oxygenated fuels programs, would likely add unnecessary confusion. Delaying the start date until after the 1997–1998 oxygenated fuels season, e.g. until March 1, 1998 or later, would impose an unnecessary burden on the majority of parties. Today's rule removes burdens associated with the maintenance of separate recordkeeping, reporting, and product transfer documentation for OPRG and non-OPRG categories, resulting in a general reduction in compliance costs. A greater cost benefit would be realized by the vast majority of parties if the rule is effective on November 1, 1997, the start date of the oxygenated fuels program. Today's rule eliminates the prohibition on adding oxygen to finished RFG, which provides regulated parties in overlap areas with added flexibility in meeting both RFG and oxygenated fuels program standards.

Although there may be an adverse effect on a few parties, the vast majority will benefit from the earliest implementation of today's rule.

EPA has provided guidance on submitting 1997 RFG reports elsewhere in this notice.

Effects on Compliance Burdens and Recordkeeping

Five commenters agreed that the rule to do away with the distinction between OPRG/non-OPRG will help add flexibility and reduce compliance burdens. Three of these five also agreed that this will also reduce compliance costs. EPA concurs with these statements. A sixth commenter was concerned that this rule will increase refiner's compliance burdens, but did not elaborate on how these burdens will increase. EPA believes that the reduction of the recordkeeping and reporting burdens associated with the OPRG category results in a positive impact in terms of cost, burden, and time for the vast majority of regulated parties.

Reporting

Some commenters who were supportive of the proposal also noted that they might not have sufficient lead time to redesign their accounting methods and reporting software. These commenters asked for flexibility in reporting. One commenter asked that reporting parties should be given the option of reporting the OPRG/non-OPRG categories for reports covering calendar year 1997.

EPA understands that this change may require alterations to some parties'

accounting methods and software. For annual reports covering calendar year 1997 and for batch reports after November 1, 1997, a reporting party may choose to report using the OPRG/non-OPRG categories (i.e., to report "as usual") or to report all OPRG in the appropriate non-OPRG categories.

For 1997 and subsequent years, EPA will look to the refiner's entire RFG production in order to determine compliance with the annual average for oxygen and will no longer recognize any distinction between OPRG and non-OPRG. The same approach will apply for compliance with the oxygen average for VOC-controlled RFG under the simple model.

EPA plans to amend its reporting forms as soon as practicable in order to reflect the elimination of the OPRG/non-OPRG distinction.

The RFG reports affected by this rule are: "Reformulated Gasoline Program Oxygen Content Averaging Report" (Simple Model & Complex Model), "Reformulated Gasoline Program Credit Transfer Summary Report," and the "Reformulated Gasoline and Anti-Dumping Batch Reports."

Product Transfer Documentation

Some commenters have asked whether they must eliminate the OPRG/non-OPRG distinction on their product transfer documentation. Redesigned documentation and forms may not be ready by the effective date.

Today's action removes all OPRG/non-OPRG distinctions in the regulations as of the November 1, 1997 effective date. Although parties may continue to use product transfer documentation differentiating OPRG from non-OPRG, such distinction is not required by EPA because it no longer holds any importance. However, regulated parties may wish to phase-out their use of OPRG category reporting, in order to reduce confusion.

Effects on Oxygenate Use/Toxic Increase

One commenter stated that removal of the OPRG category will cause refiners to use less oxygenate and more aromatics in their gasoline. The addition of aromatics would substitute for lost octane. This effect was not quantified by the commenter, who stated that today's rule will cause the gasoline to emit more toxics.

It is important to remember that EPA has not altered the standards applicable to refiners for oxygen content and toxics under either the reformulated gasoline or oxygenated fuels programs. Furthermore, the gasoline quality survey program for oxygenates and toxics, and

other enforcement mechanisms still exist to ensure that the full environmental benefits of the oxygenate content and toxics standards are realized.

It is possible that elimination of the OPRG/non-OPRG distinction may result in some decrease in the use of oxygenates, since credits generated in RFG areas that are also oxygenated fuels program areas (i.e. areas requiring a relatively high oxygen content of least 2.7 weight % oxygen during the winter months) may be used in RFG areas that are not oxygenated fuels program areas (i.e. areas requiring at least 2.0 weight % oxygen all year round). If oxygenate use decreases in some RFG/non-oxygenated fuels program areas, it is possible that toxics may increase in those areas. Nevertheless, EPA believes that the survey mechanism (discussed in greater detail for the following comment) is adequately designed to ensure the gasoline quality in each covered area will meet the standards on average for toxics.

Effects on Oxygenate Use/Survey Failures

EPA received comments pertaining to the oxygenate use and survey failures. The commenters all agreed that EPA's enforcement mechanisms, including gasoline quality surveys, provide a means to ensure compliance with RFG program requirements. Two commenters thought that there may be a marginal increase in risk, but this would be discovered through the surveys and corrected.

One commenter was concerned that blenders will take advantage of the elimination of the OPRG/non-OPRG distinction to minimize oxygenate use and this will cause areas to fail the surveys. A commenter felt that survey failures result from "refiners [who] are learning to use the [credit trading] program."⁶

EPA agrees that the risk of survey failures may increase in the absence of the OPRG/non-OPRG distinction, because more credits from RFG areas with wintertime oxygenated fuels program may be used by refiners to show compliance with the annual oxygen average applicable to the refiner, with less reliance on use of oxygen in RFG destined for RFG areas that are not

⁶The commenter also urged EPA to ratchet the minimum oxygen standard from 1.5 weight % to 1.6 weight % for areas that failed the oxygen survey series in 1996. On July 31, 1997, EPA published a notice in the *Federal Register* announcing a ratchet for several covered areas. Please refer to "Change in Minimum Oxygen Content for Reformulated Gasoline—Notice," 62 FR 41047 (July 31, 1997) for further information.

wintertime oxygenated fuels program areas. (See the preceding comment.)

The existence of the credit trading program was required by section 211(k)(7) of the Clean Air Act as amended in 1990, 42 U.S.C. § 7545. Compliance with the RFG oxygen standards is shown over the course of a calendar year averaging period. Credits may be traded within and between all covered areas. A general risk always exists, even in the absence of the OPRG/non-OPRG distinction, that one area may receive RFG with a slightly higher oxygen content than another area. The compliance survey provisions, with ratchets upon survey failures, were adopted by the Agency to address this risk. In 1993 and 1994, the specific risk of uneven RFG quality due to overlapping RFG and oxygenated fuels program areas was significantly greater than it is today. Since 1993 and 1994, many areas have redesignated to attainment for carbon monoxide (CO) and were able to drop the oxygenated fuels program. The specific risk that an area might receive relatively low oxygen RFG because of program overlap has lessened, and EPA believes that the existing survey and enforcement mechanisms are adequate to address any additional risks there might be from

eliminating the OPRG/non-OPRG category.

Phoenix, AZ

Phoenix, AZ recently opted in to the Federal RFG program. One commenter stated that this should not affect the decision to remove the OPRG reporting category. EPA agrees with this comment. Overall, the number of non-California RFG/oxygenated fuels program overlap areas has decreased significantly since the RFG program regulations were finalized in 1993. EPA does not believe that the addition of Phoenix to the program warrants the burden and expense associated with retention of the OPRG category.

Economic Impact

EPA received one comment from a party who claimed that today's rule might have an unspecified negative economic impact on one sector of the oxygenate industry (i.e., the sector that deals with oxygen credit contracts). Another commenter stated that the effort of eliminating the OPRG/non-OPRG distinction may be a great one compared to the benefit received. All other commenters endorsed the proposed changes as economically beneficial.

EPA believes that the vast majority of regulated entities, including small businesses, are reasonably expected to experience significant cost savings as a result of today's regulation. EPA does not believe that today's action will, in and of itself, have any significant impact on oxygenate markets.

EPA disagrees with the characterization that the elimination of removing the OPRG/non-OPRG distinction would require great effort. The Agency has designed the regulatory changes to permit great flexibility for all affected parties. For example, EPA has permitted flexibility in reporting for all RFG and anti-dumping reports covering calendar year 1997 and due to be submitted on or after November 1, 1997.

III. Today's Rule

EPA is amending the Federal RFG regulations to remove the use of a separate OPRG category and to eliminate the distinction between OPRG and non-OPRG. The following sections would be affected by today's proposal. In most cases, the changes are minor and would remove references to, and distinctions between, the eliminated OPRG category and RFG which is non-OPRG.

40 CFR Part 80, Section	Description of change
Section 80.2—Definitions. 80.2(nn)	Definition of "Oxygenated fuels program reformulated gasoline," or "OPRG" is deleted.
Section 80.65—General requirements for refiners, importers, and oxygenate blenders. 80.65(d)(2)(iii) (A) and (B).	Requirements for designation of gasoline as OPRG or non-OPRG are deleted.
Section 80.67—Compliance on average. 80.67(f)(2)(ii), 80.67(h)(1)(v) (A) and (B).	Deletes requirements to meet oxygen average separately and to segregate credits for non-OPRG, since the OPRG versus non-OPRG distinction is eliminated.
Section 80.69—Requirements for downstream oxygen blending. 80.69(f) (1) and (2).	These sections are deleted, to reflect that there would no longer be a category known as "OPRG." ⁷
Section 80.75—Reporting requirements. 80.75(f)(2)(ii)(A) (1) through (4) and (B) (1) and (2); 80.75(f)(2)(iii)(B); 80.75(h)(2) (i) and (ii) 80.75(p).	For 80.75(f)(2)(ii)(A) (1) through (4), the OPRG and non-OPRG distinction is eliminated. Thus, the only categories remaining are VOC-controlled (divided into subcategories 1 and 2) and non-VOC-controlled RFG. Section 80.75(f)(2)(ii)(B) (1) and (2) is deleted in order to eliminate to OPRG and non-OPRG distinction. Section 80.75(f)(2)(iii)(B), which refers to gasoline designated as non-OPRG, is deleted.
Section 80.77—Product transfer documentation. 80.77(g)(1)(ii)	Requirement to identify gasoline as OPRG or non-OPRG is deleted.
Section 80.78—Controls and prohibitions on reformulated gasoline. 80.78(a)(6).	Before today's rule, this section prohibits addition of oxygen to finished RFG, unless such RFG is designated as OPRG used in an oxygenated fuels control area during the oxygenated fuels control period. This OPRG "exception" is amended to allow for elimination of the OPRG/non-OPRG categories. Specifically, the amended section allows for addition of oxygenate to RFG intended for and used in an oxygenate gasoline program area.
Sections 80.128 and 80.129—Agreed upon procedures for refiners and importers and Agreed upon procedures for oxygenate blenders. 80.128(d)(2) and 80.129(d)(3)(iv).	Requirement to compare PTD designation consistency for OPRG versus non-OPRG is removed. Similar requirement for downstream oxygenate blenders is removed.

⁷ Note the change to section 80.78(a)(6).

IV. Statutory Authority

Sections 114, 211, and 301(a) of the Clean Air Act as amended (42 U.S.C. 7414, 7545, and 7601(a)).

V. Environmental Impact

This rule is expected to have no environmental impact. The original reason for the OPRG category was concern that RFG quality might suffer in

areas that were not both oxygenated fuels program and RFG areas. There were several such areas when the RFG rules were promulgated. However, there are now only two areas, the New York/New Jersey/Connecticut CMSA and

Phoenix, Arizona, which currently have overlapping programs during the winter months. EPA is aware of no data indicating that today's regulation will encourage the use of lower oxygen content RFG. The oxygenated fuels program and RFG program oxygen standards remain in place. The RFG standards are Federally enforced through a variety of enforcement mechanisms, including the oxygen survey program, which is specifically designed to ensure that oxygen standards are met on average in all RFG cities.

VI. Economic Impact and Impact on Small Entities

EPA has determined that this final rule will not have a significant impact on a substantial number of small entities. Small entities include small businesses, small not-for-profit enterprises, and small governmental jurisdictions. Today's regulation would have a positive economic impact on the great majority of entities regulated by the RFG regulation, including small businesses. The elimination of the OPRG/non-OPRG distinction would result in increased flexibility for regulated parties, including refiners, importers, and blenders. Specifically, elimination of this distinction from the RFG regulations alleviates the burden and cost associated with maintenance of separate recordkeeping, reporting, and product transfer documentation category for OPRG and non-OPRG gasoline. Elimination of the OPRG/non-OPRG distinction should also result in a general reduction of compliance costs associated with the need to meet the oxygen average separately for two classes of RFG. A regulatory flexibility analysis has therefore not been prepared.

VII. Paperwork Reduction Act

Per the Paperwork Reduction Act, 44 U.S.C. 3501 *et seq.*, and implementing regulations, 5 CFR Part 1320, this action does not involve the addition of any collection of information as defined therein.

VIII. Executive Order 12866

Under Executive Order 12866,⁸ the Agency must determine whether a regulation is "significant" and therefore subject to interagency review under the Executive Order. The Order defines "significant regulatory action" as one that is likely to result in a rule that may:

(1) Have an annual effect on the economy of \$100 million or more, or adversely affect in a material way the

economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local or tribal governments of communities;

(2) Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;

(3) Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof, or

(4) Raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in this Executive Order.⁹

It has been determined that this rule is not a "significant regulatory action" under the terms of Executive Order 12866 and is therefore not subject to interagency review under the Order.

IX. Unfunded Mandates

Under Section 202 of the Unfunded Mandates Reform Act of 1995 ("UMRA"), Pub. L. 104-4, EPA must prepare a budgetary impact statement to accompany any general notice of proposed rulemaking or final rule that includes a Federal mandate which may result in estimated costs to State, local, or tribal governments in the aggregate, or to the private sector, of \$100 million or more. Under Section 205, for any rule subject to Section 202 EPA generally must select the least costly, most cost-effective, or least burdensome alternative that achieves the objectives of the rule and is consistent with statutory requirements. Under Section 203, before establishing any regulatory requirements that may significantly or uniquely affect small governments, EPA must take steps to inform and advise small governments of the requirements and enable them to provide input.

EPA has determined that this rule does not include a federal mandate as defined in UMRA. The rule does not include a Federal mandate that may result in estimated annual costs to State, local or tribal governments in the aggregate, or to the private sector, of \$100 million or more, and it does not establish regulatory requirements that may significantly or uniquely affect small governments.

X. Submission to Congress and the General Accounting Office

Under 5 U.S.C. 801(a)(1)(A) of the Regulatory Flexibility Act as added by the Small Business Regulatory Enforcement Fairness Act of 1996, EPA submitted a report containing this rule to the U.S. Senate, the U.S. House of Representatives and the Comptroller

General of the General Accounting Office prior to publication of the rule in today's **Federal Register**. This rule is not a "major rule" as defined by 5 U.S.C. 804(2).

List of Subjects in 40 CFR Part 80

Environmental protection, Air pollution control, Gasoline, Reformulated gasoline, Motor vehicle pollution.

Dated: October 31, 1997.

Carol M. Browner,
Administrator.

40 CFR part 80 is amended as follows:

PART 80—REGULATION OF FUELS AND FUEL ADDITIVES

1. The authority citation for part 80 continues to read as follows:

Authority: Secs. 114, 211, and 301(a) of the Clean Air Act as amended (42 U.S.C. 7414, 7545, and 7601(a)).

§ 80.2 [Amended]

2. Section 80.2 is amended by removing and reserving paragraph (nn).

§ 80.65 [Amended]

3. Section 80.65 is amended by removing and reserving paragraph (d)(2)(iii).

4. Section 80.67 is amended by removing and reserving paragraph (f)(2)(ii) and by revising paragraphs (h)(1)(v)(A)(1) and (h)(1)(v)(A)(2) and by removing and reserving paragraph (h)(1)(v)(B) and by removing paragraphs (h)(1)(v)(A)(3) and (h)(1)(v)(A)(4) to read as follows:

§ 80.67 Compliance on average.

*	*	*	*	*
(h)	*	*	*	
(1)	*	*	*	
(v)	*	*	*	
(A)	*	*	*	
(1)	VOC controlled; and			
(2)	Non-VOC controlled.			
(B)	[Reserved]			
*	*	*	*	*

§ 80.69 [Amended]

5. Section 80.69 is amended by removing paragraph (f).

6. Section 80.75 is amended by revising paragraphs (f)(2)(ii)(A)(1), (f)(2)(ii)(A)(2), (h)(2)(i)(A) and (h)(2)(i)(B) and by removing paragraphs (f)(2)(ii)(A)(3), (f)(2)(ii)(A)(4), (h)(2)(i)(C), (h)(2)(i)(D) and by removing and reserving (h)(2)(ii) to read as follows:

§ 80.75 Reporting requirements.

*	*	*	*	*
(f)	*	*	*	
(2)	*	*	*	
(ii)	*	*	*	

⁸ 58 FR 51735 (October 4, 1993).

⁹ Id. at section 3(f)(1)–(4).

- (A) * * *
- (1) Gasoline designated as VOC-controlled; and
- (2) Gasoline designated as non-VOC-controlled.

* * * * *

- (h) * * *
- (2) * * *
- (i) * * *
- (A) VOC-controlled; and
- (B) Non-VOC-controlled.

* * * * *

7. Section 80.77 is amended by removing and reserving paragraph (g)(1)(ii).

8. Section 80.78 is amended by revising paragraph (a)(6) to read as follows:

§ 80.78 Controls and prohibitions on reformulated gasoline.

- (a) * * *
- (6) No person may add any oxygenate to reformulated gasoline, except that

such oxygenate may be added to reformulated gasoline provided that such gasoline is used in an oxygenated fuels program control area during an oxygenated fuels control period.

* * * * *

9. Section 80.128 is amended by revising paragraph (d)(2) to read as follows:

§ 80.128 Agreed upon procedures for refiners and importers.

* * * * *

- (d) * * *
- (2) Compare the product transfer documents designation for consistency with the time and place, and compliance model designations for the tender (VOC-controlled or non-VOC-controlled, VOC region for VOC-controlled, summer or winter gasoline, and simple or complex model certified); and

* * * * *

10. Section 80.129 is amended by revising paragraph (d)(3)(v) to read as follows:

§ 80.129 Agreed upon procedures for downstream oxygenate blenders.

* * * * *

- (d) * * *
- (3) * * *

(v) Review the time and place designations in the product transfer documents prepared for the batch by the blender, for consistency with the time and place designations in the product transfer documents for the RBOB (e.g. VOC-controlled or non-VOC-controlled, VOC region for VOC-controlled, and simple or complex model).

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