

Memorandum

DATE: March 22, 2005
TO: MWAQC
FROM: Joan Rohlf, Chief, Air Quality Planning
SUBJECT: SIP Development Update

The following is an update on the SIP emissions inventory, attainment modeling, control measure analysis and control strategy development. All of these SIP components are coming together, but they are taking more time than originally anticipated. The SIP schedule is being revised to reflect a delay of 2-3 months. A draft SIP is still expected to be completed later this year and to be submitted ahead of the June 2007 deadline.

SIP Development Status

- **Emissions Inventory**

The base case 2002 inventory is complete, except for possible revisions to point source data. All source categories (area, nonroad, mobile and point sources) are completed.

Future year inventories are needed for 2008 and 2009 in order to do the RFP and attainment year analysis. The 2008 RFP inventories are in progress; the 2009 inventories will be completed soon by the end of April.

Future point source inventories will not be certain until the legislative sessions are over in Virginia and Maryland. Both legislative bodies and regulatory agencies are considering or have passed new controls on power plants.

The future year inventories are needed to complete the Reasonable Further Progress reduction targets and reduction requirements for the attainment SIP. These reduction targets will be available in May.

- **Attainment Modeling**

Preliminary future case modeling indicates that the Washington region will not achieve the 8-hour ozone standard by the 2009 deadline unless more controls are implemented.

OTC modeling results for measures that are in place and are expected by 2009 ("On The Books" and "On the Way") show that the Washington

region is very close to meeting the ozone standard. Virginia modeling results are in line with the OTC results.

The region's control strategy needs to be modeled to show how effective the new measures will be in getting the reductions needed for attainment by 2009. Results from these sensitivity runs are expected in May-June.

- **Control Measure Analysis/Control Strategy Development**

The Control Measures Work Group will select measures to be modeled as a control strategy for attainment. The measures will include those agreed upon by the OTC in February as well as other local measures.

Model rules are needed for each measure adopted by the OTC. These model rules must be promulgated in time to be included in the SIP going to EPA in June. If effective, the OTC process will lead to benefits throughout the Ozone Transport Region and the Mid-West. However, the process is time-consuming and may not provide the benefits in time to be included in our SIP.

Next Steps

- Complete future year inventories for 2008, 2009
- Calculate reduction requirements for RFP, attainment (May)
- Conduct sensitivity runs for a regional control measure strategy
- Propose control measure strategy (June)
- Propose 8-hour mobile budgets (June-August 2006)
- Draft SIP to TAC, September 2006
- Draft SIP to MWAQC, October 2006

SIP due to EPA by June 2007