

DRAFT Public Comments and Proposed Responses for 8-Hour Ozone SIP							
Comment Number	Topic	Priority_Num	Commenter(s)	Date Received	Recipient	Comment	Response
Comments on Attainment Demonstration							
1	Attainment Demonstration		1 Air Quality Public Advisory Committee	4/22/2007	DC DOE and COG	The commenter is disappointed that the SIP attainment modeling does not show that all monitors in the region will comply with the 8-hour ozone standard in 2009, and that a weight of evidence approach had to be used to demonstrate compliance.	MWAQC and the states believe that the attainment demonstration presented in the SIP meets all of the federal requirements and guidelines for demonstrating attainment of the 8-hour ozone standard. Based on the attainment modeling results and weight of evidence, MWAQC and the states believe there is strong evidence that the region will attain the 8-hour ozone standard by the attainment deadline.
Comments on Control Measures							
2	Control Measures		1 Air Quality Public Advisory Committee	4/22/2007	DC DOE and COG	To protect the health of citizens in the region, the SIP should have contained a number of control measures that were considered but not adopted by the states. Source categories inadequately addressed include on-road mobile sources and area sources.	MWAQC and the states believe that the control measures included in the SIP are the measures that were identified as being feasible and cost effective, and that could be adopted and implemented within the timeframe of the SIP implementation period through May 1, 2009. Additional measures were considered but given time constraints, high cost, technology barriers, or unacceptable economic impacts, such measures were not adopted at this time. Please refer to Chapter 7 for a complete evaluation of each of the control measures considered during development of the SIP.
3	Control Measures		2 Chesapeake Climate Action Network, Environmental Resources Trust, Resource Systems Group, Jonathan Miles, Debra Jacobson	4/19/2007	COG	The commenters support inclusion of renewable energy and energy efficiency measures in the SIP, contingent on Maryland, Virginia, and the District of Columbia adopting Clean Air Interstate Rule (CAIR) regulations that will ensure that NOx	MWAQC and the states support renewable energy as an important means of reducing emissions. The states are committed to implementing effective CAIR regulations that will provide a mechanism for retiring of NOx allowances for renewable energy and energy

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						allowances are retired commensurate with the avoided emissions associated with the renewable energy or energy efficiency measure. The commenters support intensified efforts to further increase renewable energy and energy efficiency measures in the SIP in the future.	efficiency purposes.
4	Control Measures	3	City of Alexandria, Transportation & Environmental Service, Division of Environmental Quality	4/2/2007	COG	The commenter requests that emission reduction activities listed in the City's Voluntary Bundle Commitment letter (dated March 14, 2007) be incorporated into Chapter 10, Weight of Evidence section of the SIP.	MWAQC and the states agree. The information will be included in the weight of evidence portion of the final SIP.
5	Control Measures	4	Rodney Livingston	4/25/2007	DC DOE and COG	The commenter expressed concern that not enough has been done to improve air quality since 1990. The commenter suggests that regional leaders need to influence air quality improvement efforts by setting a good example. In particular, leaders should address inefficiencies in energy use for building operations through establishment of new building codes, better use of natural lighting, and more efficient light bulbs. Leaders also should mandate specific land use and transportation plan requirements to reduce demand for vehicle travel. The commenter also suggests that inefficiencies associated with food refrigeration at grocery stores need to be addressed.	MWAQC and the states agree that energy efficiency is a measure that should be expanded to help reduce energy demand and pollution in the Washington region. Local leaders are taking steps to improve building codes and encourage Green Buildings. Energy efficiency and Green Building measures have been included in the voluntary bundle in Chapter 6 of the SIP. The National Capital Region Transportation Planning Board (TPB) is also actively encouraging transit oriented development.
6	Control Measures	5	Julie Crenshaw van Fleet	4/26/2007	VA DEQ and COG	The commenter said that old coal-fired power plants cause health concern for the region as well as for local residents affected by the	MWAQC and the states agree that emissions from coal-fired power plants need to be addressed to improve air quality in the

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						emissions. Large corporations should take additional actions to mitigate the risk posed by operating such facilities.	Washington, DC region. The SIP contains provisions for significant reductions from the facilities located in the region. The VA CAIR rule contains provisions that do not allow trading of NOX and SO2 within the nonattainment areas, thereby requiring facilities within the nonattainment area to reduce their emissions. The MD Healthy Air Act (HAA) sets strict caps on coal fired power plants and also restricts trading. Modeling has shown that the NOX emission reductions associated with these local requirements, which are stricter than federal requirements, will improve air quality. MWAQC and the states continue to work through the Ozone Transport Commission (OTC) process to seek additional emission reductions, either voluntarily or within a regulatory framework, from coal-fired power plants within our region and nationally.
Technical Corrections							
7	Technical Corrections	1	Virginia Department of Environmental Quality	4/13/2007	COG	For the following source categories, update emissions and associated documentation in the Base Year 2002 emission inventory document and its appendices (Appendix B of SIP) to reflect the BY 2002 emission estimates for these categories provided to MWCOG in VDEQ's most recent emission inventory (NIF3.0) file for area & nonroad sources (non-Nonroad model): 1) Surface Coating – Traffic Paint/Lane markings (2401008000) – All NOVA Jurisdictions 2) Surface Coating – Industrial Maintenance	MWAQC and the states agree. The changes will be reflected in the final SIP.

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						(2401100000) – All NOVA Jurisdictions 3) Graphic Arts (2425000000) – All NOVA Jurisdictions 4) Military Aviation – Fairfax County 5) Military and General Aviation - Prince William County Changes in the Base Year 2002 emission inventory made above will change the future year inventories and associated analyses and documentation. Therefore, also update future year emissions and associated analyses and documentation in the main SIP document and related appendices.	
8	Technical Corrections		2 Maryland Department of the Environment	4/13/2007	COG	The commenter requests that a summary of the weight of evidence document provided in the appendix of the SIP be included in the main chapters of the SIP document. The commenter is not requesting any substantial or significant changes to the SIP document but a relatively simple summary of the WOE appendices.	MWAQC and the states agree. A summary will be included in the final SIP.
Other Comments							
9	Other		1 Chesapeake Climate Action Network, Environmental Resources Trust, Resource Systems Group, Jonathan Miles, Debra Jacobson	4/19/2007	COG	Increased use of zero-emitting energy sources will be essential in reducing both greenhouse gas and NOx and other ozone precursor emissions.	MWAQC and the states agree that zero-emitting energy sources will provide benefits in terms of reduced emissions of both greenhouse gases and ozone precursors.
10	Other		2 Air Quality Public Advisory Committee	4/22/2007	DC DOE and COG	The federal government did not take its full responsibility to assist the metropolitan Washington region to regulate sources currently preempted from local or regional	MWAQC agrees that emission reductions are needed from source categories which cannot be regulated by state or local governments. This SIP contains a number of important

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						control.	measures that were enacted by the federal government, including the Clean Air Interstate Rule, motor vehicle emission standards, and emission standards for non-road equipment. MWAQC and the state air agencies continue to work through the Ozone Transport Commission (OTC) process and other avenues to encourage the federal government to take regulatory action to further reduce emissions from federally preempted sources.
11	Other	3	Jeffrey Choy (Washington, Maryland, Delaware Service Station and Automotive Repair Association (WMDA) Advisor)	4/23/2007	MDE	Maryland is the last state on east coast to maintain and run a centralized vehicle I/M program. All other states are decentralized, allowing providers to offer this service in many more outlets for the convenience of their citizens.	There are a number of states that continue to implement a centralized system like Maryland. The State of Delaware and the District of Columbia operate centralized programs. The State of New Jersey operates a program that includes centralized as well as decentralized elements, as does the State of Colorado. In addition, there are numerous other states across the country that have chosen to maintain a centralized I/M program, including Arizona, Illinois, Indiana, Ohio, Oregon, Tennessee, Washington, and Wisconsin. In all, one-third of the states' I/M programs are centralized.
12	Other	4	Jeffrey Choy (Washington, Maryland, Delaware Service Station and Automotive Repair Association (WMDA) Advisor)	4/23/2007	MDE	Maryland has only 19 I/M outlets statewide, too few outlets, public is forced to travel greater distances, wasteful of state resources (costs), public's time and gas.	Maryland's VEIP is comprised of 87 test lanes at 19 stations located in 14 jurisdictions. When the current VEIP network was designed, station locations were considered on the basis of several factors, including County populations and motorist convenience. In looking at motorist convenience, site selections were made with

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							<p>a goal of 94% of motorists within 12 miles of a test facility, and 99% of motorists within 20 miles.</p> <p>Wait time for motorists at VEIP stations average less than 5 minutes across the network. (Wait times can be longer during peak testing days and times). Short wait times, along with evening and weekend station operating hours are conducive to motorists combining multiple errands, in addition to the VEIP inspection, in a single trip, thus minimizing time, and gas usage.</p>
13	Other		5 Jeffrey Choy (Washington, Maryland, Delaware Service Station and Automotive Repair Association (WMDA) Advisor)	4/23/2007	MDE	Modern high tech vehicles today are designed for "plug & play" operation where emission testing can be sensibly performed by readout. It is antiquated to do I/M by engine rev-up, tailpipe sensing, rolling wheels.	In the Maryland VEIP vehicles are tested according to their design technology. Model year 1996 and newer light-duty vehicles (up to 8,500 pounds Gross Vehicle Weight Rating) are tested by retrieving information directly from the vehicle's On-Board Diagnostics (OBD) system. The VEIP also tests pre-1996 vehicles and heavy-duty vehicles weighing more than 8,500 pounds that are not equipped with the OBD system. These vehicles must be tested using tailpipe emissions measurement technology. The tailpipe testing equipment currently in use in the VEIP is the most appropriate testing equipment available for making tailpipe emissions measurements.
14	Other		6 Jeffrey Choy (Washington, Maryland, Delaware Service Station	4/23/2007	MDE	Current state system and procedures for retests allows for a measure of fraud, and a loophole to pass vehicles that have failed.	It is not clear to MDE precisely what procedures the commenter sees as a potential for fraud during retests of failed

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			and Automotive Repair Association (WMDA) Advisor)				vehicles in a centralized program; nor how a decentralized program would make a difference.
15	Other	7	Jeffrey Choy (Washington, Maryland, Delaware Service Station and Automotive Repair Association (WMDA) Advisor)	4/23/2007	MDE	EPA has no problem with decentralization of the I/M process.	Maryland's centralized VEIP is approved by EPA. While EPA has also approved decentralized programs around the country, that does not mean that a decentralized program is the best fit for every state, nor does it mean that EPA favors decentralized over centralized.
16	Other	8	Jeffrey Choy (Washington, Maryland, Delaware Service Station and Automotive Repair Association (WMDA) Advisor)	4/23/2007	MDE	I/M contract in Maryland will expire in 2008 and it appears that the state will maintain the current system rather than decentralize.	The current VEIP contract will expire in 2009. The State is currently reviewing several program options and considering multiple factors, including administrative, operational, and oversight costs, motorist cost and convenience, and air quality benefits. All of these elements will be factored in to the State's decision for the post-2009 VEIP.
17	Other	9	Charley Baummer, Metropolitan Washington Airports Authority	4/27/2007	Virginia DEQ	The commenter is concerned that the presentation of non-road emissions in Appendix D of the Draft SIP does not seem to allow a straightforward determination of construction equipment emissions from areas less than entire counties. For actions such as airport improvement projects that are subject to the National Environmental Policy Act and to General Conformity requirements, it is particularly important to be able to document whether the SIP includes construction equipment emissions for these actions. It is not clear from the present draft SIP how this might be accomplished.	Construction equipment emissions are provided by the Nonroad model only at the county level and not for areas less than entire counties. The Nonroad model projects these emissions for different years based on assumptions on growth projections for construction equipments for those years and applying appropriate controls thereafter.

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18	Other	10	Charley Baummer, Metropolitan Washington Airports Authority	4/27/2007	Virginia DEQ	The commenter is concerned that Appendix D of the SIP does not appear to account for VOC emissions from asphalt paving in Virginia. If the SIP otherwise includes such emissions, we would appreciate it if the SIP would include more explicit information on how this is addressed.	<p>There are 2 different types of asphalt paving emissions included in Virginia inventories for future years. Since these emissions are very low (see Virginia 2008 emissions below) and Appendix D only shows emissions at 2 decimal point level due to space limitation, these emissions show up only as 0.00 there.</p> <p>Asphalt Paving Cutback (2461021000): 0.0004 tpd of VOC Emulsified Asphalt (2461022000): 0.0019 tpd of VOC</p> <p>Details on the methodology to calculate the BY 2002 emissions are provided in the Appendix B (By 2002 Emissions Inventory Document) at page 3-26 and 3-27 and future year inventories in the chapter 4 at page 4-4 of the SIP.</p>