

Update on Appendix D

(1997 Annual PM2.5 NAAQS Maintenance Plan for Washington Region)

1. Status of MOVES2014 Annual PM2.5 & NOx Mobile Budgets & Revised PM2.5 Maintenance Plan (1997 Annual PM2.5 NAAQS)

Milestone years for the revised plan – 2007, 2017, and 2025

a. Mobile Emissions

- i. Draft 2017 PM2.5 and NOx emissions developed
- ii. Draft 2025 PM2.5 and NOx emissions currently being reviewed
- iii. Annual 2007 PM2.5 and NOx emissions will be developed after 2030 and 2040 emissions are developed (expected by July end).
- iv. **TPB is scheduled to approve final 2007, 2017, and 2025 emissions in October 2015.**

b. Point, Area, and Nonroad emissions

- i. States agreed in November 2014 to not making any changes to the point, area, and nonroad source emissions for 2017 and 2025 as no significant changes in growth and control assumptions in the plan have occurred that could change the main conclusions of the plan. A West Virginia ozone maintenance plan revision that included updated mobile budgets but not updated emissions from the rest three sources used the above mentioned reason for not doing so and was approved by EPA.

Previous COG analysis – Showed there are no significant changes to population, household, and employment projections that are used for area source emissions projections. In nonroad sector, Tier 3 rule and rail engine change outs in northern Virginia will only lower 2017 and 2025 emissions.

Question – Does the committee want to move ahead with its previous decision to not making any changes to the three sources? If not, then states need to provide any updated projected 2017 and 2025 point source emissions. COG staff can develop updated area and nonroad source emission for 2017 and 2025. This could take about two months and results will be available around September/October 2015.

c. Timelines for the Revised PM2.5 Maintenance Plan

- i. Draft revised plan document for MWAQC-TAC review: October/November 2015
- ii. MWAQC approval for public comment and hearing: December 2015
- iii. Public comment and hearing: January/February 2016
- iv. Final MWAQC approval for EPA submittal: February End, 2016
- v. States submit revised plan to EPA: March 2016

2. Reasonable Further Progress Plan (2008 Ozone NAAQS)

A draft RFP plan was shared with MWAQC in July 2014, which demonstrated that the Washington region is projected to reduce its emissions by 45% during the RFP period January 1, 2012 through December 31, 2017 using a combination of VOC and NOx emission reduction. Since only 15% emission reduction is required to meet the RFP requirements during the above period, the region met these requirements by a much bigger margin than needed.

Inputs used for RFP calculations

Point source emissions - DC & VA – 2011 & 2017, MD – 2011 also used for 2017

Area sources - Annual Energy Outlook 2014, COG Cooperative forecast round 8.2, Control Factors – MARAMA CFs for portable fuel container and a few other sources

Nonroad sources - NMIM model, Reduced VRE commuter rail emissions

Mobile sources – MOVES2010a (2013 CLRP)

Question – Does the committee see any need to update the RFP plan at this time?

3. Feasibility of (and getting SIP Credit for) Achieving Emissions Reductions Across the Entire Region from Market Forces that will result in cleaner products being distributed across the entire region even when the regulations driving the cleaner products have only been adopted in a part of the region.

Currently, a jurisdiction estimates and takes credit for emissions benefits for a cleaner consumer product only if that particular jurisdiction has adopted a regulation for that product. However, market forces often result in that particular product being distributed in neighboring jurisdictions with no such regulation. Therefore, even in the absence of such a regulation, the entire region actually is the beneficiary of emission reductions.

In order to estimate such emissions reductions properly and possibly get SIP credits for them, COG staff is proposing a three-step approach.

- a. Survey of consumer product rules currently adopted by the District, Maryland, and Virginia
- b. Survey of markets to find out how many of the above cleaner consumer products are being distributed in jurisdictions where there are currently no rule driving them.
- c. Estimation of emissions benefits being realized in those jurisdictions for those products.

Following table shows the status of various consumer products rules in the District, Maryland, and Virginia.

Table: Status of Regulations based on OTC 2001 Model Rules

Jurisdiction	Consumer Products (Phase I)	Architectural and Industrial Maintenance Coatings	Portable Fuel Containers	Mobile Equipment Repair and Refinishing	Solvent Cleaning
DC	Effective	Effective	See 2006 rule	Effective	Effective
MD	Effective (COMAR 26.11.32)	Effective (COMAR 26.11.33)	See 2006 rule	Effective (similar rule)	Effective (similar rule)
VA	Effective	Effective	See 2006 rule	Effective	Effective

Table: Status of Regulations based on OTC 2006 Model Rules

Jurisdiction	Consumer Products (Phase II)	Adhesives and Sealants	Portable Fuel Containers (w/ Kerosene)
DC	VOC reg amendments effective Jan 1, 2012	VOC reg amendments effective Jan 1, 2012	VOC reg amendments effective Jan 1, 2012
MD	Effective 06/18/07	Standards effective 04/07/08; Single Ply Roof Amendment: Effective 06/01/09	Effective 06/18/07
VA	Effective March 17, 2010	Effective March 17, 2010	Effective March 17, 2010

Table: Status of Regulations based on OTC 2009-2013 Model Rules (As of May 2015)

Jurisdiction	Consumer Products Update	Architectural and Industrial Maintenance Coatings	Mobile Equipment Repair and Refinishing	Solvent Degreasers
DC	Under Review	Under Review	Under Review	Under Review
MD	Under Review	Under Review	Effective April 16, 2012	
VA	No Action to date	No Action to date	No Action to date	No Action to date

Next steps: A survey of the distribution of the cleaner products shown in tables above will need to be taken up followed by estimation of emissions benefits.

4. Development of New Regulatory and Voluntary Control Measures (In case transportation buffers are triggered)

The District and Maryland will work to adopt five new regulations in the event transportation buffers are triggered. These are low sulfur home heating fuel, enhancements to current controls on consumer products and industrial adhesives, off-road idling, and tougher requirements for smaller boilers. Virginia will also pursue measures such as; motor vehicles being provided the option of remotely passing the biannual inspections by 2015. Additionally, Virginia plans to pursue voluntary energy efficiency and renewable energy programs. Organizations, such as the non-profit Local Energy Alliance Program (LEAP) run residential and commercial energy use reduction programs. Regional Action Plan adopted recently by MWAQC covers a number of such state and local measures and implementation of this plan will extend this aspect of Appendix D further.