

EPA Response to Proposed Methodology to Update 2008 Ozone NAAQS Maintenance Plan

Hello,

Per our last meeting, I wanted to provide a response and reference for you concerning the update of the MVEBS in the 2008 ozone NAAQS maintenance plan using the newer MOVES3 model. The basis of this response is on the [MOVES3 Policy Guidance](#), in particular, question 8.

Background:

The preliminary study performed by the National Capital Region Transportation Planning Board (TPB) showed that NOx emissions produced by MOVES3 were higher by about 9%, 26%, 52%, and 54% in 2025, 2030, 2040, and 2045 respectively compared to those produced by MOVES2014b in those years. The study also showed that MOVES3-based NOx emissions were higher compared to Tier 2 MVEBs in. To that point, this difference in NOx between the two models was mentioned in the [Federal Register notice of availability](#) for MOVES3. It's also covered in EPA's [Overview of MOVES3](#), in Section 6.1, with a short discussion of the reasons.

As noted, conformity requirements for the 2008 ozone NAAQS is required because the 2008 ozone NAAQS has not been revoked. Areas designated for the 2008 ozone NAAQS will have to demonstrate conformity for that NAAQS using budgets for that NAAQS even after the area has adequate or approved budgets for the 2015 ozone NAAQS. If this area is designated for both NAAQS, conformity must be determined for both NAAQS, and since the area has budgets for the 2008 ozone NAAQS, the MPO must continue to use these MVEBs for conformity for the 2008 ozone NAAQS.

Given the substantive changes to onroad inventories due to MOVES3 as demonstrated above, we are proposing to update only the following components of the above plan.

1. Onroad emissions inventories and MVEBs for 2025 and 2030 using MOVES3, and
2. Nonroad emissions inventories for 2025 and 2030 using MOVES3

We are proposing to retain current emissions inventories for point, non-point (area), and commercial marine vessels, airport, and railroad (MAR) sources for 2014, 2025, and 2030 in the above plan as we believe there are no meaningful changes to those inventories since they were submitted in 2018 as part of the above plan.

To this point, according to the [MOVES3 Policy Guidance](#), question 8, the SIP still has to show its purpose even with revised budgets. As a result, it is important to look and see if the other non-motor vehicle sources are still accurate, then explain how these sources and assumptions have not changed in your submission.

I have provided for you a reference from Pennsylvania (please see State Submittal linked), [Approval and Promulgation of Air Quality Implementation Plans; Pennsylvania; Update of the Motor Vehicle Emissions Budgets for the Allentown-Bethlehem-Easton 1997 8-Hour Ozone National Ambient Air Quality Standard Maintenance Area](#). In this example, PA updated the highway emissions estimates using the newer

MOVES2010a model from MOBILE6.2; however, PA did not update emissions estimates for nonroad sources (See Section 1.3; Page 4 of the State Submittal). However, it is important to note that PA did indeed need to update the point sources as noted in the State Submittal. The full rationale for the non-mobile inventory review can be found in Section 1.5; Pages 7-9. The full rationale for the Point Source Category Emissions can be found in Section 2.1; Pages 9-11 (this category needed updating). The full rationale for the Area Source Category can be found in Section 2.2; Pages 12-15. The full rationale for the Nonroad Source Category Emissions can be found in Section 2.3; Pages 15-16. The full rationale for the Highway Source Category Emissions can be found in Section 2.4; Pages 16-18.

Please feel free to contact me moving forward. I will continue to search more examples if need be.

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