



## MEMORANDUM

**TO:** Metropolitan Washington Air Quality Committee  
**FROM:** Jeffrey King, COG Director, Climate, Energy, and Air Program  
**SUBJECT:** Ozone Planning Activities for Washington Region (2015 Ozone NAAQS)  
**DATE:** May 26, 2021

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The purpose of this memo is to provide an update on the status of the Washington region's efforts to attain the 2015 ozone National Ambient Air Quality Standard (NAAQS). The memo also describes actions currently planned to be undertaken by the Washington region with regard to the 2015 Ozone NAAQS.

### BACKGROUND

The U.S. EPA (EPA) promulgated the 2015 ozone National Ambient Air Quality Standard (NAAQS) at 70 parts per billion (ppb) on October 1, 2015. Subsequently the EPA designated the Washington region as a Marginal nonattainment (NAA) area for the 2015 ozone NAAQS on August 3, 2018.<sup>1</sup> Classification of Marginal NAA is the lowest of the six levels of non-attainment. Being a Marginal NAA, the region submitted a base year emissions inventory for 2017 and was not required to submit an attainment demonstration State Implementation Plan (SIP).<sup>2</sup> The measured air quality reading (design value) in the region needs to be at or below 70 PPB by August 3, 2021 to attain the 2015 ozone NAAQS. The EPA is required to review the data submitted and reclassify the region's attainment status by February 3, 2022.

The region's draft design value for the period 2018-2020 is 71 parts per billion, indicating that the region had not attained the 2015 ozone NAAQS by the start of 2021. EPA's guidance for attainment planning had indicated that data from 2021 could not be used in attainment demonstration, since the ozone period would not have ended before the attainment date of August 3. As such it is likely the EPA will reclassify (bump up) the region as a Moderate nonattainment area based on the 2018-2020 data.

As a Moderate NAA, the region will face an attainment deadline of August 3, 2024 and will have to submit a SIP demonstrating attainment and reasonable further progress (RFP). These plans will likely be due to the EPA by January 2023.

### PLANNED ACTIONS

The air agencies of the District of Columbia, Maryland and Virginia have agreed to proactively begin working on an attainment plan for the above standard as would be required of a Moderate nonattainment area. The work activities are the main aspect of the FY 2022 work program and will follow the attached schedule once the schedule is finalized (see page 3). Development of a control

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<sup>1</sup> Federal Register, Vol. 83, No. 107, June 4, 2018

<sup>2</sup> Base Year Inventory: (<https://www.mwcog.org/file.aspx?&A=S7iEiltADGE6Eu0AXu2TGYqMqEC0smhz158nbo15Dj0%3D>)

measures strategy for the attainment plan, including state/local programs and federal actions to control emissions from upwind states, will be an integral part of the work program activities.

In addition to initiating work on an attainment plan for the 2015 ozone standard, Virginia and the District are prepared to inform the EPA of their determination that a voluntary reclassification (as a Moderate NAA) is the correct course of action in order to provide the region with enough time to come into attainment of the 2015 Ozone NAAQS and for the three states and MWAQC to better coordinate the submission of state implementation plan. Virginia and the District also intend to request that EPA only take action to redesignate if the area remains in nonattainment at the end of the 2021 ozone season, based on preliminary design value data for 2019 to 2021. The draft letters for Virginia and the District are attached.

**Draft 2015 Ozone SIP Schedule (5/11/2021)**

		2021												2022											
No.	Tasks	Apr	May	Jun	Jly	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jly	Aug	Sep	Oct	Nov	Dec			
1	Decide on Action / Communicate Option & initial Qs to EPA																								
2	EPA Response on initial questions																								
3	Evaluation of Attainment (2021 Monitor data)																								
4	EPA Reclassification Decision																								
5	Photochemical Modeling of NA Area																								
6	Weight of Evidence analysis																								
7	Inventories: 2017 Updates Non-Point & Non-Road (with MOVES 3)																								
7a	2017 Update On Road (with MOVES 3; 2020 VIN; Ver 2.4 model)																								
7b	2023 projection: Point, Area, Non- (MOVES 3) & On-Road (Above)																								
8	Motor Vehicle Emissions Budgets																								
9	RACM																								
10	Contingency Measures																								
11	Voluntary Measures																								
12	<b>Draft RFP &amp; Attainment SIPs</b>																								
13	EPA Review & Comment																								
14	<b>MWAQC Approval for Public Comments</b>																								
15	Public Hearings																								
16	Address Public Comments & Finalize SIPs																								
17	<b>States Submit RFP &amp; Attainment SIPs</b>																								
<b>Notes</b>																									
1. April: Communicate to EPA decision on planning option. Inform about plans to begin SIP work and submit set of initial questions about RFP/Attainment SIPs																									
2. September: Determine if draft 2019-2021 Design Value data shows attainment.																									
3. October: Based on evaluation of attainment status, decide on Attainment SIP or Maintenance Plan. A new schedule will be developed for a Maintenance Plan if necessary.																									



**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
Department of Energy and Environment

Diana Escher  
U.S. Environmental Protection Agency  
Region III (Mail Code: 3RA00)  
1650 Arch Street  
Philadelphia, PA 19103-2029

**RE: Request for Reclassification from Marginal to Moderate for the Washington, DC-MD-VA Nonattainment Area for the 2015 8-hour Ozone National Ambient Air Quality Standard**

Dear Acting Regional Administrator Escher:

The District of Columbia Department of Energy and Environment (DOEE) along with our counterparts in Maryland, Maryland Department of Environment (MDE), and Virginia, Virginia Department of Environmental Quality (VA DEQ), have found that the lead design value in the Washington DC-MD-VA nonattainment area is above the level of the 2015 8-hour Ozone National Ambient Air Quality Standard (NAAQS) and thus we are not attaining the Ozone NAAQS based on 2018 to 2020 design values. As a result, the District is requesting that the Washington DC-MD-VA nonattainment area be reclassified to moderate for the 2015 Ozone NAAQS.

The Washington, DC-MD-VA nonattainment area is made up of Washington, DC, the surrounding counties in Maryland of Calvert, Charles, Frederick, Montgomery, and Prince George's, the surrounding counties in Virginia of Arlington, Fairfax, Loudoun, and Prince William, and the surrounding independent cities in Virginia of Alexandria, Fairfax, Falls Church, Manassas Park, and Manassas.

The three air quality agencies, in conjunction with the Metropolitan Washington Air Quality Committee (MWAQC), have reviewed planning options and DOEE has determined that a reclassification is the correct course of action in order to provide the region with enough time to come into attainment of the 2015 Ozone NAAQS. This considers on-the-books measures for which emissions reductions have yet to be realized and the planning horizons necessary to implement any potential additional measures. It also would allow for emissions reductions to be realized that will occur upon implementation of Good Neighbor State Implementation Plans (SIPs) in upwind states that were due on August 3, 2018 and related Federal Implementation Plans (FIPs) that EPA will be issuing this August according to Clean Air Act mandated timeframes for any insufficient or missing SIPs.

This approach will also provide certainty for completing any measures necessary to attain the 2015 Ozone NAAQS, whereas other approaches introduce uncertainty and could result in compressed timelines. This will also allow the three regions to begin a dialogue with EPA in

order to ascertain the necessary deadlines for regulation implementation and planning exercises.

As a result, the District is requesting that EPA reclassify the Washington, DC-MD-VA nonattainment area to moderate nonattainment for the 2015 Ozone NAAQS.

Sincerely,

Kelly Crawford,  
Associate Director, Air Quality Division, DOEE

cc: Tommy Wells, Director, District of Columbia Department of Energy and Environment  
Collin R. Burrell, Deputy Director, Environmental Services Administration, DOEE  
Austina Casey, Manager, Environmental Program Branch, DDOT  
George (Tad) Aburn, Director, Air and Radiation Administration, MDE  
Michael Dowd, Director, Air and Renewable Energy Division, Virginia DEQ  
Jeff King, Director, Climate, Energy and Air Program, MWCOG  
Cristina Fernandez, Director, Air Protection Division, United States EPA Region 3

DRAFT

Diana Escher  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region III (Mail Code: 3RA00)  
1650 Arch Street  
Philadelphia, PA 19103-2029

RE: Request for Reclassification from Marginal to Moderate for the Washington, DC-MD-VA Nonattainment Area for the 2015 Ozone National Ambient Air Quality Standard

Dear Acting Regional Administrator Escher:

The Virginia Department of Environmental Quality (DEQ) is requesting that the northern Virginia portion of the Washington DC-MD-VA 2015 Ozone National Ambient Air Quality Standards (NAAQS) marginal nonattainment area be reclassified to moderate. While great progress has been toward meeting the ozone standard, one monitor in the area continues to have a three year average design value of 71 parts per million (ppm) that is just above the regulatory standard of 70 ppm. As a result, the area remains out of compliance with the standard and will not come into attainment by the statutory deadline for marginal areas of August 3, 2021. Therefore, DEQ believes that requesting a reclassification to moderate is a prudent approach to facilitate continued ozone air quality improvement.

The Washington, DC-MD-VA area is made up of Washington, DC, the surrounding counties in Maryland of Calvert, Charles, Frederick, Montgomery, and Prince George's, the surrounding counties in Virginia of Arlington, Fairfax, Loudoun, and Prince William, and the surrounding independent cities in Virginia of Alexandria, Fairfax, Falls Church, Manassas Park, and Manassas.

DEQ, in conjunction with the Metropolitan Washington Air Quality Committee (MWAQC), the District of Columbia Department of Energy and Environment, and the Maryland Department of the Environment, has determined that a reclassification is the correct course of action in order to provide the region with enough time to come into attainment of the 2015 Ozone NAAQS. This approach considers on-the-books measures for which emissions reductions have yet to be realized and the planning horizons necessary to implement any potential additional measures. This approach also provides opportunity for the three states and MWAQC to better coordinate the submission of state implementation plan revisions with EPA.

DEQ further requests that EPA only take action to approve the voluntary bump-up request if the area remains in nonattainment at the end of the 2021 ozone season, based on preliminary design value data for 2019 to 2021. The states and MWAQC will review the ozone season air quality data and resulting design values at that time and will continue forward with the

attainment plan if the area does not attain the standard, or shift to developing a redesignation request and maintenance plan if the area does attain the standard.

Thank you for your assistance in this matter and in continuing to improve air quality in Virginia.

Sincerely,

David K. Paylor