

Memorandum

DATE: September 16, 2005

TO: MWAQC Technical Advisory Committee

FROM: Joan Rohlf, Chief, Air Quality Planning

SUBJECT: SIP Development Update

I. Regulatory Changes

The SIP development schedule is more complicated now with the addition of planning for the fine particle standard in addition to the 8-hour ozone standard. In addition, the States are preparing to address EPA's new Clean Air Interstate Rule (CAIR).

EPA still has not released the second phase of guidance for the 8-hour ozone SIP. In early September EPA released guidance for the PM_{2.5} SIP which is due in April 2008.

CAIR Rule

The CAIR Rule must be adopted by the states and a CAIR SIP must be submitted to EPA by September 11, 2006. In August EPA issued a proposed Federal Implementation Plan (FIP) for the CAIR to take effect in CAIR states in case these states fail to submit adequate CAIR SIPs. The FIP is a response to North Carolina's Section 126 petition issued in March 2004 naming 13 states that contribute significantly to nonattainment for the 8-hour ozone and PM_{2.5} NAAQS. EPA is denying North Carolina's petition on the basis that the CAIR FIPs will get the needed reductions from the states named in the petition.

EPA modeling for the CAIR rule indicates that CAIR will help the Washington region meet the fine particle standard by 2010, but CAIR is not sufficient to get the region to meet the ozone standard by the deadline.

PM_{2.5}

In April 2005 EPA designated most of the Washington region nonattainment for PM_{2.5}. The attainment date for PM_{2.5} and 8-hour ozone is 2010. EPA tried to harmonize the SIP schedules for ozone and fine particles, but due to delays the PM_{2.5} SIP is due ten months after the ozone SIP deadline. The ozone SIP is due in June 2007; the PM_{2.5} SIP is due February 2008.

EPA proposed implementation guidance for PM_{2.5} last week on September 9, 2005. There will be a 60 day comment period from the date of publication in the

Federal Register. The proposed rule requires all nonattainment areas to control PM2.5 direct emissions, sulfur dioxide, and NOx. VOC and ammonia are not required unless the states or EPA determine that either compound is a significant contributor. EPA expects the 2004 Clean Air Nonroad Diesel Rule and CAIR to help all areas to meet the PM2.5 standards.

There are many reasons for combining the PM2.5 and ozone planning tasks. Regional haze modeling being done by the Regional Planning Organizations (MARAMA and VISTAS) addresses both PM2.5 and ozone and uses inventories developed for both pollutants.

In July the Interstate Air Quality Council (IAQC) met with the MWAQC leadership to discuss regional air quality issues and PM2.5 planning. The IAQC requested that MWAQC coordinate PM2.5 planning for the Washington region and specifically requested certain SIP tasks be added to the current FY06 MWAQC work program to be performed within the approved budget. The tasks include developing a PM2.5 inventory from the inventories developed for regional haze modeling, developing a list of control measures for fine particles and analyzing the co-benefits (PM2.5, NOx, VOC) of control measures on the control measure list. In addition, a conformity determination for fine particles must be completed and approved by April 2006. This month MWAQC will act to amend the MWAQC FY 2006 work program to include these PM2.5 planning tasks.

II. Status of SIP Planning and Transportation Conformity Tasks

Control Measure Development:

A master list of over 200 control measures has been developed and the Control Measures Work Group has identified top priorities for regional, IAQC action, and local action. New potential measures are being added to the list as a result of actions taken by states in the Ozone Transport region.

Measures ozone list have been identified as having co-benefits for fine particles. The next step is to develop a master list of particle control measures and identify those having co-benefits for ozone.

Modeling Analysis

Virginia Dept. of Environmental Quality is doing the attainment modeling for the Washington nonattainment region. The draft modeling protocol is being revised, base case scenarios for 2002 have been developed and assessed, and future 2009 inventories are being completed this month. Future 2009 scenarios are expected to be completed in November. VDEQ expects to give a status report on the modeling in October.

Inventory Development

The base case and attainment year inventories for ozone are complete, with the exception of the mobile inventories, which need to be run with the 2005 vehicle registration data and additional new inputs.

The PM2.5 inventories are being developed from the existing MARAMA and VISTAS inventories for regional haze planning. The PM2.5 mobile inventories need to be developed with new meteorological inputs to reflect the complex relationships between nitrogen oxides and particle formation.

Conformity

The Dept. of Transportation Planning (DTP) completed an 8-hour conformity determination for the FY2005-2010 TIP and CLRP. This month TPB will consider its second 8-hour conformity assessment for the FY2006-2011 TIP and CLRP. Both 8-hour ozone conformity assessments were made using an interim 8-hour ozone mobile budget which is the one-hour ozone budget in the region's approved one-hour ozone SIP. DTP expects to complete PM2.5 conformity for the CLRP/TIP in October.

This fall DTP will complete the new 8-hour ozone mobile inventories using 2005 vehicle registration data.

Next Steps

- MWAQC approves amending MWAQC FY2006 Work Program and Budget to include PM2.5 work activities (9/28/05)
- TPB approves 8-hour conformity assessment for 2006-2011 TIP/CLRP (10/19/05)
- DTP completes 8-hour ozone mobile emissions SIP inventories (10/05)
- DTP completes PM2.5 mobile emissions inventories 10/05
- Completion of 2009 ozone emissions inventories (with revised mobile inventories)
- Completion of regional PM2.5 inventories for 2002
- Control Measure Work Group meets to re-assess priority measures
- VDEQ reports to MWAQC on attainment modeling