

EPA Response to List of Questions – RFP/Attainment SIPs (2015 Ozone NAAQS)
(Washington DC-MD-VA 2015 NAAQS Marginal Nonattainment Area)

The US EPA (EPA) designated the Washington DC-MD-VA region as a marginal nonattainment (NAA) area for the 2015 ozone NAAQS on August 3, 2018. The region's design value needs to be at or below 70 ppb by August 3, 2021 in order to attain the above NAAQS. Since this date is in the middle of the ozone season 2021, the design value needs to be based on data for the full ozone season periods of 2018 through 2020.

Based on the design value for the period 2018-2020 (71 ppb), the region did not attain the NAAQS. Having missed the attainment deadline, the region decided to start developing Reasonable Further Progress (RFP) and Attainment SIPs now so it could submit them in time in the event EPA reclassifies the region as a moderate nonattainment area and requires it to submit above SIPs.

1. Attainment Demonstration SIP Submittal Date: What will be the plan submittal deadline in case it is required to be submitted to EPA? **Likely 1/1/2023**
2. Reasonable Further Progress (RFP) Base Year: The Washington region submitted its base year 2017 emissions inventory for the 2015 ozone NAAQS. The region plans to use 2017 as the base year for RFP demonstration. Is this ok with EPA? **Yes**
3. RFP Demonstration Period: January 1, 2018 – December 31, 2023
RFP will be demonstrated by showing 15% emission reduction between 2017 and 2023 using either VOC or NO_x or a combination of the two. Is this assumption correct? **This is correct, assuming there has been an approved ROP plan for another NAAQS**
4. Attainment Year: The attainment year for the reclassified Washington moderate nonattainment area will be 2023 as the actual attainment date of August 3, 2024 is in the middle of the ozone season of that year. Is this assumption correct, and if so, would that be the modeled/inventoried year for both SIP work and transportation conformity? **Attainment year is 2023**
5. Emissions inventories of pollutants for RFP and attainment demonstration: VOC & NO_x. Is this assumption correct? **Yes**
6. Emission period – Point and non-point source emissions will be developed for an average day for a typical ozone season work weekday. Nonroad and onroad source emissions will be developed for an average weekday in July to represent a typical ozone season work weekday. These approaches are consistent with previous attainment and maintenance plans developed by the three states and MWAQC. Are these assumptions appropriate for the 2015 ozone NAAQS moderate nonattainment planning process? **Yes**
7. Methodology for the development of average ozone season work weekday (OSD)

emissions for 2017 and 2023 **OK**

- i. Point sources: Year-specific OSD emissions for the two years will be developed.
- ii. Non-Point sources:
 1. 2017 – Year-specific OSD emissions will be developed.
 2. 2023 - 2017 emissions will be projected to 2023 using appropriate growth factors.
- iii. Nonroad sources – MOVES3.0.1 model will be used along with meteorology data for July 2017.
- iv. Onroad sources – MOVES3.0.1 model will be used along with meteorology data for July 2017.

The Washington region intends to use photochemical modeling analysis currently being pursued, which uses 2016 as the base year to project emissions to the attainment year 2023. Since the region will be using 2017 as the base year for projecting emission to 2023, is this **OK with EPA? Would have to show that 2016 emissions are a conservative approach/comparable to 2017 (comparison of 2 years would be helpful).**

8. Control Measures – Energy Efficiency & Renewable Energy (EERE) measures will be explored for possible use as Weight of Evidence measures for attainment demonstration and/or for voluntary measures. Any latest information you would like us to consider while considering those measures?
9. Contingency Measures
 - i. RFP Contingency – A list of contingency measures will be developed in case the Washington region is not able to meet its RFP emission reduction requirement. These measures will account for at least 3% VOC and/or NO_x emission(s) of the base year 2017.
 - ii. Attainment Contingency - A list of contingency measures will be developed in case the Washington region is not able to demonstrate attainment by 2023. These measures will account for at least 3% VOC and/or NO_x emission(s) of the base year 2017.
 - iii. Since both RFP and attainment milestone years are same, would including just one set of contingency measures in the SIP be sufficient for both RFP and attainment contingency purposes? **I don't think we've come to a conclusion on this issue. From my understanding, the contingency measures for ozone milestones (182(c)(9)) are "in addition to" the ones for failure to attain but everything else is in 172(c)(9) which doesn't say "in addition to".**
10. Reasonably Available Control Measures (RACM): A list of RACM measures will be developed. **OK**
11. Motor Vehicle Emissions Budgets (MVEBs) - A set of MVEBs will be developed for RFP and attainment year 2023. **OK**
12. Photochemical Modeling: Results from ongoing photochemical modeling efforts

will be included to demonstrate attainment by 2023. **OK**

13. Data Submittal Format – Is there any specific format in which we need to provide emissions data for four different sources (point, non-point, nonroad, and onroad) e.g., by SCC, by vehicle type, etc.? **By SCC**
14. Any other pertinent information EPA would like to provide?