

**Questions on Revision and Submission of
PM2.5 Maintenance Plan and Mobile Budgets
& Initial Responses**

Background

The Washington region submitted a maintenance plan for the 1997 annual PM2.5 standard (15 µg/m³) to EPA in June/July 2013, which was approved and published in the federal register on October 6, 2014 and became effective on November 5, 2014. This plan contained motor vehicle emissions budgets (MVEBs) for NOx and PM2.5 for 2007, 2017, and 2025.

State air agencies of the District of Columbia, Maryland, and Virginia committed to submit to EPA updated annual MVEBs for NOx and PM2.5 as a revision to the above plan by the end of 2015 (Appendix D, PM2.5 Redesignation Request & Maintenance Plan).

As the Washington region starts to work on revising the above plan and MVEBs for submission to EPA, there are a few questions that need to be addressed related to the process of revising emissions inventories for the four sectors and MVEBs in addition to the deadline for submitting the plan. These questions are listed below along with their corresponding initial responses based on the discussion among the state air agency and COG staff.

Questions & Initial Responses

1. **Revised PM2.5 Maintenance Plan submission deadline** – States committed to submit updated mobile emissions budgets as a revision to the plan by the end of 2015 (Appendix D). The revision of the plan and budgets was not required by the CAA or any EPA regulation. Consequently, the revised plan submission deadline was also not set by the CAA or any EPA regulation, but by the states. However, the plan was approved recently by EPA with the above commitment. Therefore, do we need to seek EPA's approval for the extension of the submission deadline?

Response

Based on the verbal/informal interaction between state air agency and EPA R3 staff in the past, it seems that since the deadline was self-imposed and not mandated by the CAA or any EPA regulation, simply explaining why we were late in the submittal would be sufficient. A short discussion could be included in the revised submittal noting that the new version of MOVES (MOVES2014), which includes the effects of new federal rules, was needed to make the updates to the budgets meaningful. Given that the timeline for making this version available to the states was elongated, the deadline set in the plan was by necessity missed.

2. **Update of attainment year 2007 mobile emissions and budgets** – Appendix D only mentions submission of updated 2017 and 2025 mobile budgets. However, the policy guidance document for MOVES2014 mentions updating the attainment year (2007) inventory as well so that emissions for all three years are estimated using MOVES2014. Does this policy guidance mean we must submit revised 2007 mobile emissions as well as budgets?

Response

The MOVES2014 policy guidance document mentions updating the attainment year (2007), interim year (2017), and the maintenance year (2025) onroad mobile emissions inventories using the same

model version (MOVES2014) whenever a plan is revised for submission to EPA to maintain consistency. Also, one of the criteria used to demonstrate maintenance of the 1997 annual PM_{2.5} standard in the plan was that the 2017 and 2025 emissions are lower compared to the 2007 emissions. For these reasons, we would likely need to revise our 2007 emissions with MOVES2014 to perform a proper comparison with the 2017 and 2025 emissions. One of the EPA staff affirmed this. However, another EPA staff had a different opinion and did not think it was necessary. We need to get a definitive answer from EPA on this.

Note: The updated 2007 mobile budgets may only be useful if the first milestone year of the 2016 CLRP (transportation conformity) analysis is earlier than 2017. Onroad emissions for the period 2017 through 2024 would need to conform to the 2017 budgets and the onroad emissions for 2025 and beyond would need to conform to the 2025 budgets.

3. **Plan revision requirement for the other three emission source inventories (point, area, nonroad) –** The MOVES2014 policy guidance document mentions that states need to document that the growth and control assumptions for other three sectors are still valid and any minor changes do not change the overall conclusion of the plan if they just want to update the onroad mobile portion of the plan. Otherwise, emissions from the three sectors would need to be revised as well. The document advises states to contact EPA to decide what portions of the plan need to be updated. Do we need to update emissions for point, area, and nonroad sources?

Response

Based on the prior experience of state air agencies, it does not seem necessary to update emissions for point, area, and nonroad sources. These sectors need not be updated unless there is compelling information that indicates the emissions estimates made in the plan might be exceeded. A few plan revision submittals such as those submitted by West Virginia and Pennsylvania and subsequently approved by EPA have included a short description of growth to justify not updating these emissions. A short description noting that the growth indicators used for metro DC region continue to be appropriate and that the estimates for the three source sectors should therefore be conservative, should be sufficient for the Washington region's submittal.