

MOBILE BUDGET MARGIN OF SAFETY (MoS) OPTIONS UNDER CONSIDERATION, 4/25/12

VDEQ Option A: Apply 20% and 30% MoS to the mobile budgets for 2017 and 2025 respectively, for both PM2.5 and NOx. (TPB recommended option)

VDEQ Option B: Keep the levels of MoS in option A above, but revise the budgets and MoS downward if new federal onroad emission control programs (e.g., Tier 3) are implemented in order to allow for a commensurate reductions in mobile budgets.

VDEQ Option C: A tiered mobile budget approach where EPA would approve two sets of budgets. The first set of budgets would include a modest MoS (28 tons) for PM2.5 only (none for NOx) for 2025 to meet the currently projected shortfall in 2040, which would allow the region to meet the short term conformity tests. The second set would be contingency budgets that would contain 20% and 30% MoS for 2017 and 2025 respectively, which would be used in case of any model and/or input data changes, which are outside the control of TPB, the Metropolitan Planning Organization (MPO) for transportation.

DDOE/DDOT Option D: This option allows for a modest (5-10%) MoS for PM2.5 only (none for NOx) for 2025 to meet the currently projected shortfall in 2040, which would allow the region to meet the short term conformity tests. This option also has a provision to revisit the budgets in the PM2.5 maintenance plan if there are major changes in the MOVES model that result in significant changes to emissions estimates.

MDE Option 1: No submission of PM2.5 redesignation request and maintenance plan. This will resolve the issue of mobile budgets and MoS for now. Later on, once model and data related issues have been resolved, the plan can move forward.

MDE Option 2 (Option E): It is a compromise between VDEQ's option B & option C and the District of Columbia's option. It has three elements:

- Establishes safety margins (no specific data provided) similar to District's option above, that are contingent upon or triggered by new modeling and/or new data (consistent with VDEQ's option C).
- A commitment to update mobile budgets when new federal on-road measures are implemented or by 2015, whichever is earlier unless both the Washington and Baltimore areas show attainment for the ozone and PM2.5 standards. Safety margins would sunset in 2015.
- Includes SIP commitments from each jurisdiction to adopt a number of measures such as, low sulfur home heating oil, OTC control measures for distributed generation, natural gas compression stations, industrial solvents, consumer products and off-road idling.