

Email: Mike Gordon/Gregory Becoat
CC: State Air Agencies, MWAQC, and TPB Staff

Subject: Proposal to update MVEBs in the 2008 ozone NAAQS maintenance plan

Dear Mr. Gordon & Mr. Becoat:

EPA recently published MOVES3 model for developing onroad and nonroad emissions inventories. EPA mandates the use of this model for SIP submission and Conformity Analysis.

Following publication of the above model, the National Capital Region Transportation Planning Board (TPB) conducted a preliminary study that compared onroad emissions generated by MOVES3 and MOVES2014b (Item 3, <https://www.mwcog.org/events/2022/9/13/mwaqc-tac/>). MOVES2014b is very similar to MOVES2014a, which was used to develop onroad emissions and motor vehicle emissions budgets (MVEBs) for 2014, 2025, and 2030 in the Washington region's 2008 ozone National Ambient Air Quality Standard (NAAQS) maintenance plan. The study showed that NOx emissions produced by MOVES3 were higher by about 9%, 26%, 52%, and 54% in 2025, 2030, 2040, and 2045 respectively compared to those produced by MOVES2014b in those years. The study also showed that MOVES3-based NOx emissions were higher compared to Tier 2 MVEBs in the above plan. This will have significant implications in terms of TPB's ability to demonstrate transportation conformity with MVEBs in the above plan for the 2008 ozone NAAQS. It is important to note that EPA requires states to demonstrate conformity with the 2008 ozone NAAQS until that standard has been revoked and the Washington region has a new set of MVEBs approved or deemed adequate for the 2015 ozone NAAQS based on the latest mobile emissions model. Since the only available MVEBs currently for the Washington region are in its 2008 NAAQS ozone maintenance plan, the region needs to update them with MOVES3 in order to demonstrate air quality conformity in the next conformity cycle.

For the reason mentioned above, the Washington region is planning to update MVEBs in the 2008 ozone NAAQS maintenance plan using the latest EPA approved mobile emission model called MOVES3. TPB will need approved (or deemed adequate), updated MVEBs by the end of 2023 for its next air quality conformity analysis of the 2024 Long-Range Transportation Plan (2024 LRTP).

Given the substantive changes to onroad inventories due to MOVES3 as demonstrated above, we are proposing to update only the following components of the above plan.

1. Onroad emissions inventories and MVEBs for 2025 and 2030 using MOVES3, and
2. Nonroad emissions inventories for 2025 and 2030 using MOVES3

We are proposing to retain current emissions inventories for point, non-point (area), and commercial marine vessels, airport, and railroad (MAR) sources for 2014, 2025, and 2030 in the above plan as we believe there are no meaningful changes to those inventories since they were submitted in 2018 as part of the above plan.

In this respect, we also want to draw your attention to a recent decision taken by EPA Region 4 that allowed the North Carolina Department of Environmental Quality, which happened to be in a similar situation as the Washington region, to update their 2008 ozone NAAQS maintenance plan and MVEBs therein by updating only the onroad and nonroad emissions components of that plan.

We hope you will concur with our proposal and allow us to update the above plan and MVEBs therein by just updating the emissions of onroad and nonroad source components of that plan.

Let me know if you have any questions.

Thanks,

Sunil Kumar