

UPDATE ON 2015 OZONE NAAQS PLANS

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Background

- Draft 2018-20 ozone Design Value (DV) data (71 ppb) available at the end of 2020 showed the Washington region did not attain the 2015 ozone NAAQS.
- Following this, the region expected EPA to reclassify it to the next higher nonattainment level (Moderate Nonattainment Area) after August 3, 2021 (attainment deadline) and decided to develop a Moderate NAA attainment plan by the end of 2022.
- EPA is expected to publish a final rule by February 3, 2022 in this regard.
- Meanwhile, the region attained the above NAAQS based on the draft 2019-2021 DV data (70 ppb).
- Once final 2019-2021 DV becomes available after May 1, 2022, EPA could issue a Clean Data Determination (CDD).
- This would suspend the requirement for submitting an attainment plan and states will be able request EPA to redesignate the area to attainment and submit a maintenance plan instead to demonstrate continued compliance into the future with the above NAAQS.

Status of Ozone Planning

- The District of Columbia recently requested EPA to invalidate the entire 2020 ozone season data citing the “Exceptional Events” criteria.
- EPA has not taken any decision or indicated any timeline yet for a response to the above request.
- Depending on EPA’s decision, the region may remain in nonattainment and get reclassified to Moderate NAA or may attain and get redesigned as an attainment area if the region request so.
- With this uncertainty in mind, the region decided to keep working on the attainment plan and initiate the development of a redesignation request and a maintenance plan. Once the situation becomes clear, the region can focus just on one of the two plans.
- The attainment plan is scheduled to be developed by the end of 2022 while the redesignation request and maintenance plan (RR/MP) needs to be developed by Spring 2023.
- While the attainment plan schedule is required to meet EPA’s deadline in case submittal of such plan will be required, the schedule for RR/MP is important to allow the region to have an EPA approved (or deemed adequate for conformity purposes) MOVES3 based MVEBs in time for the next conformity cycle.

Status of Attainment Plan

- **Status of Emissions Inventories (Base Year – 2017, Attainment Year – 2023)**
 - Base Year 2017 Inventory
 - Washington region submitted BY2017 inventory in 2020.
 - District and Virginia recently indicated no updates to the BY2017 inventory.
 - Nonroad and onroad inventories will be updated using MOVES3 model. Request for mode inputs will be sent out to states in January 2022.
 - Attainment Year 2023 Inventory
 - States will be providing point source inventories
 - Nonroad and onroad inventories will be developed using MOVES3 model.
 - Non-point and marine, air, and rail (MAR) inventories for 2023 can be developed by projecting either BY2017 or 2020 using appropriate growth surrogates and factors. This is scheduled to start this month.
 - *Question – Would above 2020 inventories be available in time from NEI2020 effort for projecting them to 2023 or should we stick with 2017?*



Status of Attainment Plan

- Status of Photochemical Modeling
 - 2016 Emissions Platform Updates
 - a) Emission inventory (MARAMA)
 - i) 2016v2 emission inventory QA/QC ongoing
 - ii) EPA modeling for proposed 2015 ozone NAAQS transport rule already performed, does not include 2016v2 modeling
 - b) Modeling center coordination and modeling results (NY DEC)
 - i) Wrapping up SMOKE processing for base year 2016V2 emissions. Will proceed with 2023 SMOKE processing and sector and state tagging.
 - ii) Processing large domain U.S. to update BCON with 2016v2



Status of Maintenance Plan

- **Selection of milestone years**
 - Need to coordinate with TPB to align with conformity milestone years and with EPA to get confirmation on those years
 - Initial thoughts on years
 - Proposed base year – 2017
 - Proposed attainment year – 2020
 - Proposed intermediate year – 2026 (EPA ozone transport modeling year) or 2030 (TPB conformity year)
 - Proposed future year - 2032 (EPA ozone transport modeling year) or 2035 (TPB conformity year)
 - Non-point and marine, air, and rail (MAR) inventories for intermediate and future years can be developed by projecting either BY2017 or 2020 using appropriate growth surrogates and factors. This is proposed to start this month.
- *Question - Would above 2020 inventories be available in time from NEI2020 effort for projecting them to intermediate and future years or should we stick with 2017?*