

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY Street address: 629 East Main Street, Richmond, Virginia 23219 Mailing address: P.O. Box 1105, Richmond, Virginia 23218 www.deq.virginia.gov

Molly Joseph Ward Secretary of Natural Resources David K. Paylor Director

(804) 698-4000 1-800-592-5482

October 3, 2016

Mr. Shawn M. Garvin Regional Administrator EPA Region III 1650 Arch Street Philadelphia, PA 19103-2029

Dear Mr. Garvin:

Pursuant to Section 107 (d) (1) (A) of the Clean Air Act and on behalf of the Governor of the Commonwealth of Virginia, I hereby submit the initial recommendations and comments on the designations of areas in Virginia under the 2015 8-hour Ozone National Ambient Air Quality Standard (NAAQS).

Let me first state that great progress has been made in improving ozone air quality in Virginia and nationwide since the 1997 and 2008 ozone standards were implemented. This progress is due to coordinated efforts at the federal, state, and local levels to reduce ozone precursor pollutants and the transport of ozone from one area to another. This progress is clear in that most of Virginia is already in attainment status for the 2015 ozone standard.

However, the new 2015 ozone standard poses a significant challenge to us all that will require an even higher level of cooperation. We believe that new or revised regional and national control programs must be a key component to the overall attainment strategy for this standard if states and individual nonattainment areas are to achieve timely compliance. Emission inventory analyses and air quality modeling results show that sectors such as nonroad and on-road diesel engines as well as on-road gasoline engines are very important sectors to ozone formation. Implementation of control programs for these sectors is problematic for states due to statutory constraints and the ubiquitous nature of these emissions sectors. Therefore, I urge the EPA to move forward quickly to evaluate and implement new or updated strategies that can assist the states in this regard.

Virginia jurisdictions have successfully used both the Early Action Compact program and the Ozone Advance program to implement voluntary measures aimed at reducing ozone precursors. EPA should continue to offer these flexible programs as options for effective Mr. Shawn M. Garvin October 3, 2016 Page 2 of 3, Virginia Ozone Designation Letter

ozone planning. EPA should also offer the option of participating in such a program to marginal ozone nonattainment areas. Such areas have a short timeline for compliance and no formal planning requirements other than inventory development. Allowing marginal areas to participate would encourage local and regional reductions of precursors to further aid in timely compliance so that citizens may breathe healthier air sooner.

The specific area recommendations of the Commonwealth are provided with this letter, and the enclosures to this letter provide more detail and supporting documentation. While the certified 2013 through 2015 ozone air quality data for Virginia presented in Enclosure I demonstrates that all monitors in the Commonwealth complied with the 2015 ozone standard, the most recent preliminary ozone air quality data for Virginia shows one monitor in Northern Virginia (i.e., Aurora monitor, Arlington, VA) is likely to be slightly above the new standard. Therefore, these recommendations are partially based on uncertified air quality data and cover the years 2014 through 2016. A copy of the uncertified 2014-2016 air quality data is included as part of the supporting documentation for these recommendations contained in Enclosure II.

#### Northern Virginia Nonattainment Area

The Commonwealth's recommendation for this area, which is part of the Greater Washington DC/MD/VA Metropolitan statistical Area (MSA), is that the nonattainment area boundary in Virginia be the same as the previous 2008 8-hour nonattainment area. We believe that this recommendation is supported by the marginal nature and scope of the nonattainment situation in the DC area with only two potentially violating monitors at the current time. As such, Virginia believes that a designation of marginal nonattainment for this area is most appropriate based on preliminary air quality data for years 2014-2016. The Commonwealth further recommends that the greater Washington, DC/MD/VA area remain a separate nonattainment area under the new standard, as this area already has well established and effective air quality and transportation planning processes.

#### **Remaining Areas in Virginia**

As I mentioned previously, all other monitors in the Commonwealth are in compliance with the new ozone standard. Therefore, Virginia recommends that all the remaining areas in Virginia be designated unclassified/attainment for this standard. Further specifics on these recommended designations can be found in Enclosure III.

As always, the Commonwealth reserves the right to provided additional and/or updated information to inform the designation process as it proceeds. This information could include, but is not limited to, updated ozone monitoring data as it becomes available.

In summary, the Commonwealth of Virginia requests that the EPA carefully consider and adopt the area recommendations provided by this letter. We believe that the recommendations made are both reasonable and appropriate given the supporting Mr. Shawn M. Garvin October 3, 2016 Page 3 of 3, Virginia Ozone Designation Letter

documentation provided. These area designations, along with timely and effective programs at the national level addressing significant sources of ozone precursor emissions and the continuance of voluntary programs like Ozone Advance, will provide the tools needed to further improve air quality in Virginia.

Thank you again for this opportunity to provide input on this important issue for Virginia. Please contact me if you have any questions concerning these recommendations.

Sincerely,

David K. Paylor

Enclosures

cc: Cristina Fernandez, EPA Region II Air Protection Division Director Michael G. Dowd, DEQ Air Division Director

# **ENCLOSURE I**

#### Virginia Department of Environmental Quality

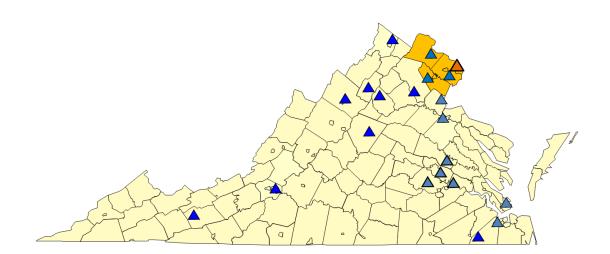
#### 2013-2015 Fourth Highest Daily Maximum Ozone 8-hour Averages

| Units, ppb<br>Certified as of March 1, 2016 |           |      |      |          |                |          |  |
|---|-----------|------|------|----------|----------------|----------|--|
| Monitoring Sites                            | AIRS ID   | 2013 | 2014 | 2015     | 3-year average | Complete |  |
| 104-4-4-0-4                                 | F11070000 | 50   | 64   | 50       | 60             | V        |  |
| Wythe Co.                                   | 511970002 | 59   | 64   | 58       | 60             | Y<br>Y   |  |
| Rockbridge Co.                              | 511630003 | 58   | 58   | 56       | 57             |          |  |
| Page Co.                                    | 511390004 | 60   | 58   | 59       | 59             | Y        |  |
| Fauquier Co.                                | 510610002 | 59   | 59   | 56       | 58             | Y        |  |
| Caroline Co.                                | 510330001 | 65   | 61   | 62       | 62             | N        |  |
| Rockingham Co.                              | 511650003 | 58   | 58   | 60       | 58             | Y        |  |
| Albemarle Co.                               | 510030001 | 60   | 59   | 58       | 59             | Ν        |  |
| Roanoke Area:                               |           |      |      |          |                |          |  |
| Roanoke Co.                                 | 511611004 | 57   | 60   | 62       | 59             | Y        |  |
| Frederick County Area:                      |           |      |      |          |                |          |  |
| Frederick Co.                               | 510690010 | 60   | 59   | 61       | 60             | Y        |  |
| Richmond Area:                              |           |      |      |          |                |          |  |
| Chesterfield Co.                            | 510410004 | 63   | 61   | 63       | 62             | Y        |  |
| Henrico Co.                                 | 510870014 | 65   | 62   | 64       | 63             | Ν        |  |
| Hanover Co.                                 | 510850003 | 66   | 62   | 61       | 63             | Y        |  |
| Charles City Co.                            | 510360002 | 61   | 66   | 59       | 62             | Y        |  |
| Hampton Roads Area:                         |           |      |      |          |                |          |  |
| Hampton                                     | 516500008 | 68   | 61   | 65       | 64             | Y        |  |
| Suffolk - TCC                               | 518000004 | 65   | 58   | 61       | 61             | Y        |  |
| Suffolk - Holland                           | 518000005 | 65   | 63   | 60       | 62             | Ŷ        |  |
| Fredericksburg Area:                        |           |      |      |          |                |          |  |
| Stafford Co.                                | 511790001 | 64   | 62   | 63       | 63             | Y        |  |
| Northern Virginia Area:                     |           |      |      |          |                |          |  |
| Loudoun Co.                                 | 511071005 | 66   | 63   | 71       | 66             | Y        |  |
| Prince William Co.                          | 511530009 | 66   | 62   | 67       | 65             | Ý        |  |
| Arlington Co.                               | 510130020 | 67   | 71   | 73       | 70             | Ý        |  |
| Fairfax Co Lee Park                         | 510590030 | 67   | 65   | 72       | 68             | Ŷ        |  |
| enandoah National Park - Madison Co.        | 511130003 | 63   | 62   | 63       | 62             | Y        |  |
| te operated by the National Park Service)   |           |      | ~-   |          | ~_             | •        |  |
| Giles Co. CASTNET                           | 510719991 | 61   | 62   | 63       | 62             | Y        |  |
| Prince Edward Co. CASTNET                   | 511479991 | 60   | 63   | 66<br>57 | 60             | Ŷ        |  |
| Sites in italics                            |           |      |      |          |                |          |  |
| exceeded the 8-hour ozone                   |           |      |      |          |                |          |  |
| standard for 2013-2015                      |           |      |      |          |                |          |  |

**ENCLOSURE II** 

## COMMONWEALTH OF VIRGINIA AREA DESIGNATION RECOMMENDATIONS UNDER THE 2015 8-HOUR OZONE NATIONAL AMBIENT AIR QUALITY STANDARD (NAAQS)

## **TECHNICAL SUPPORT DOCUMENT**





#### BACKGROUND

On October 1, 2015, the U.S. Environmental Protection Agency (EPA) strengthened the National Ambient Air Quality Standard (NAAQS) for ground level ozone from 0.075 parts per million to 0.070 parts per million (ppm). This action was taken by EPA in light of new and compelling scientific evidence that a lower standard was needed to protect human health and welfare.

One of the first actions required when a new air quality standard is established is to designate areas in regard to compliance with the standard. Those areas that are not in compliance with the standard are designated as "nonattainment" areas, while areas in compliance are designated "attainment". Areas where insufficient data is available to make a determination are designated as "unclassifiable".

On February 25, 2015, the Acting Assistant Administrator, Janet G. McCabe, issued guidance to EPA and the states on the process and factors to consider when designating areas under the new ozone standard. In general, this guidance recommended the use of census bureau areas such as Core Based Statistical Areas (CBSA) or Combined Statistical Areas (CSA) as the starting point for nonattainment area designations when a violating ozone air quality monitor is present. However, EPA also allows states the flexibility to make area specific designations based on five ozone related factors that are listed below:

- Ozone air quality data,
- Emissions and emissions-related data (location of sources and contribution to ozone),
- Meteorology (weather/transport patterns),
- Geography/topography, and
- Jurisdictional boundaries.

The approach taken to making individual jurisdiction determinations is further based on the following hierarchy of criteria:

- Does the jurisdiction have a violating ozone monitor?
- Is the jurisdiction part of a current ozone nonattainment or maintenance area?
- Would exclusion of the jurisdiction create an illogical result, such as an attainment area within a larger nonattainment area?
- Does the jurisdiction significantly contribute to ozone formation in a nearby recommended nonattainment area?

For any areas requiring a determination of significant contribution and that do not meet any of the other criteria above, a clear and compelling case is required based on available data for the five EPA factors to make a nonattainment recommendation.

The purpose of this technical support document is to describe the analyses performed by the Virginia Department of Environmental Quality (VDEQ) to support the area designations recommendations that are being submitted to the EPA as part of the ozone standard implementation process.

EPA will consider these recommendations and either accept or modify these recommendations. EPA will notify the Commonwealth of any modifications made by letter no later than June 2, 2017 and will then provide a 30-day public comment period. The Commonwealth will then have an opportunity to submit additional information prior to EPA's final issuance of designations by October 1, 2017.

### 2015 OZONE AREA DESIGNATIONS

Section 107(d) (1) of the CAA directs the EPA to designate an area "nonattainment" if it is violating the NAAQS or if it is contributing to a violation of the NAAQS in a nearby area. In identifying any air quality monitoring sites with data that show a violation of the 2015 ozone NAAQS, VDEQ considered both the EPA certified 2013-2015 8-hour ozone data (Enclosure I) and preliminary 2014-2016 8-hour ozone data (Appendix A). The certified 2013-2015 8-hour ozone data clearly demonstrate that no monitors in Virginia are in violation of the new ozone standard of 70 ppb. However, preliminary 2014-2016 ozone data indicate that the Aurora Hills monitor in Arlington County, VA is above the new standard (i.e., 72 ppb). The Aurora Hills monitor is the only monitor in the Commonwealth that is out of compliance with the 2015 ozone standard.

#### 2015 OZONE AREA DESIGNATIONS: NONATTAINMENT AREA ANALYSES AND BOUNDARY DETERMINATION

Arlington County, VA is part of the Greater Washington DC/MD/VA Metropolitan Statistical Area (MSA). When determining non-attainment area boundaries, this analysis primarily considers the ozone factors (Appendix B) and hierarchy or ranking of criteria for jurisdictions located in the Greater Washington DC/MD/VA MSA (Appendix C) and previous non-attainment area boundaries. As part of the 1997 ozone standard designation process, the City of Fredericksburg, Stafford County, and Spotsylvania County were designated as a separate nonattainment and air quality planning area for ozone in 2004. Because of the precedent set this separate status under the CAA and because the monitors associated with this area in compliance with the new 2015 ozone standard by a large margin, these jurisdictions were not included this analyses.

As a result of this analysis and other considerations, the Commonwealth of Virginia recommends retaining the boundaries of the Northern Virginia non-attainment area set during the designation process for the 1997 and 2008 ozone standards. The jurisdictions that make up this nonattainment area are shown and listed below:

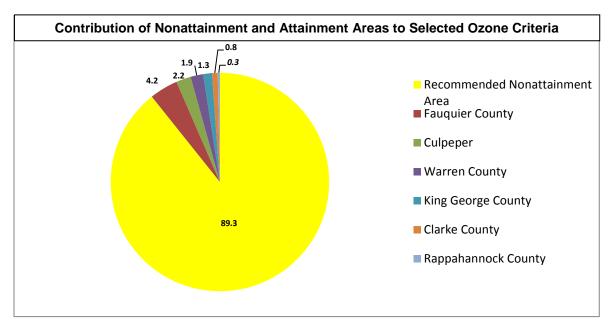


#### Northern VA Nonattainment Area

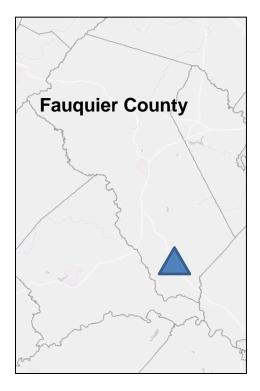
Arlington County Fairfax County Loudoun County Prince William County City of Alexandria City of Fairfax City of Falls Church City of Manassas City of Manassas Park The Northern Virginia Nonattainment area is part of the Metropolitan Washington DC-MD-VA nonattainment area, which also includes the District of Columbia and jurisdictions in southern Maryland.

As shown by the figures below, the Commonwealth believes that these nonattainment recommendations for the Virginia portion of the Metropolitan Washington DC-MD-VA nonattainment area are reasonable and appropriate in that the recommended jurisdictions account for 89.3% of the ozone precursor pollutants, population, expected growth, and vehicle miles of travel for the area.

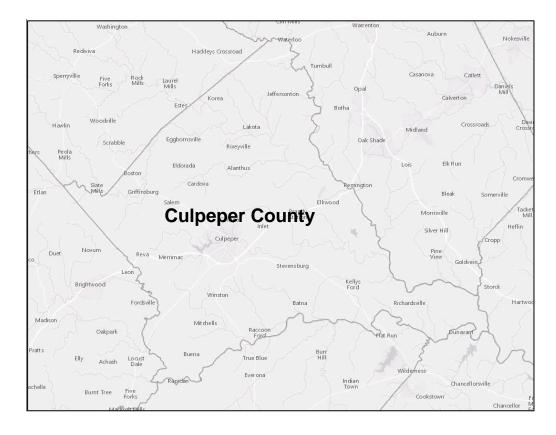
| Ranking of Selecte    | ed Ozone C                     |                    | he Virginia<br>C/MD/VA N         |                              | ions in the         | Virginia p                    | ortion of                            |
|-----------------------|--------------------------------|--------------------|----------------------------------|------------------------------|---------------------|-------------------------------|--------------------------------------|
| County/City           | Area<br>Emissions <sup>1</sup> | Area<br>Population | Population<br>Growth for<br>Area | Vehicle<br>Miles<br>Traveled | Combined<br>Average | Emission<br>Density<br>ton/sq | Population<br>Density<br>Population/ |
|                       |                                |                    | Percent                          |                              |                     | mile/per<br>day               | sq mile                              |
|                       | F                              | Recommended        | Nonattainmen                     | t Jurisdiction               | IS                  |                               |                                      |
| FAIRFAX COUNTY        | 37.0                           | 44.6               | 26.6                             | 45.7                         | 38.5                | 0.242                         | 2,767                                |
| PRINCE WILLIAM COUNTY | 15.6                           | 16.6               | 21.9                             | 15.7                         | 17.4                | 0.118                         | 1,195                                |
| LOUDOUN COUNTY        | 14.3                           | 12.9               | 27.9                             | 11.5                         | 16.6                | 0.071                         | 606                                  |
| ARLINGTON COUNTY      | 8.0                            | 8.6                | 9.5                              | 7.7                          | 8.4                 | 0.790                         | 7,994                                |
| ALEXANDRIA CITY       | 4.8                            | 5.8                | 6.0                              | 3.6                          | 5.0                 | 0.822                         | 9,314                                |
| MANASSAS CITY         | 1.3                            | 1.6                | 1.7                              | 1.2                          | 1.5                 | 0.349                         | 3827.6                               |
| FAIRFAX CITY          | 1.0                            | 0.9                | 0.6                              | 0.8                          | 0.9                 | 0.410                         | 3616.8                               |
| MANASSAS PARK CITY    | 0.4                            | 0.6                | 0.6                              | 0.1                          | 0.4                 | 0.423                         | 5632.6                               |
| FALLS CHURCH CITY     | 0.4                            | 0.5                | 0.7                              | 0.3                          | 0.5                 | 0.344                         | 6169.1                               |
|                       |                                | Recommend          | ed Attainment Ju                 | urisdictions                 |                     |                               |                                      |
| FAUQUIER COUNTY       | 6.8                            | 2.7                | 1.6                              | 5.7                          | 4.2                 | 0.027                         | 100.7                                |
| CULPEPER COUNTY       | 3.1                            | 1.9                | 1.2                              | 2.5                          | 2.2                 | 0.021                         | 123.1                                |
| WARREN COUNTY         | 3.3                            | 1.5                | 0.7                              | 2.0                          | 1.9                 | 0.039                         | 176.0                                |
| KING GEORGE COUNTY    | 2.0                            | 1.0                | 0.9                              | 1.4                          | 1.3                 | 0.028                         | 131.3                                |
| CLARKE COUNTY         | 1.4                            | 0.6                | 0.1                              | 1.3                          | 0.8                 | 0.020                         | 79.7                                 |
| RAPPAHANNOCK CO.      | 0.6                            | 0.3                | 0.0                              | 0.4                          | 0.3                 | 0.005                         | 27.7                                 |
|                       | 100.0                          | 100.0              | 100.0                            | 100.0                        | 100.0               | 0.081                         | 766                                  |



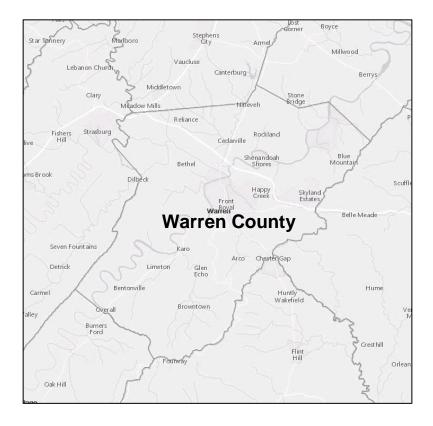
The individual jurisdictions recommended for attainment status do not significantly contribute to the overall levels of the major ozone related criteria of emissions, population, growth, and vehicle traffic. Also in the specific case of Fauquier County, there is an ozone monitor located in this county that has a certified design value of 58 ppb, has a preliminary design value of 59 ppb, and is in compliance with the new standard. Specific factor data is provided below for each recommended attainment jurisdiction.



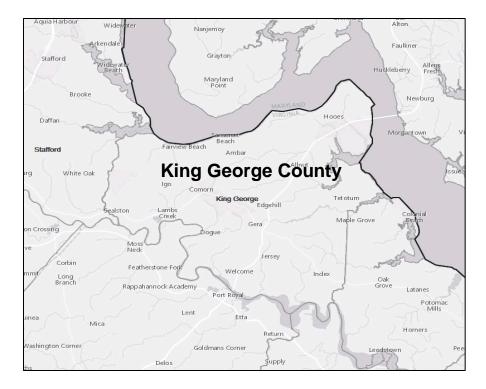
|                    | Analysis of Ozone Related Criteria                                     |
|--------------------|--|
| Emissions (2011)   | 3,003 tons/year VOC and 3,377 tons/year NO <sub>X</sub> (6.8% of ozone |
|                    | precursor emissions in the study area).                                |
| Emissions Density  | 0.027 tons/day/ square mile.   |
| Population (2010)  | 65,203 – 101 per square mile (2.7% of the total population in the      |
|                    | study area).   |
| Population Growth  | Population has grown to 68,782 in 2015, which represents only          |
|                    | 1.6% of the total population growth expected in the study area.        |
| Air Quality        | Compliant Monitor - Design Value (20013 to 2015): 58 ppb.              |
| Commuting Patterns | The majority of county workforce trips are internal. Most external     |
|                    | commutes are to other jurisdictions in the study area.                 |
| Annual VMT (2011)  | 1.2 billion annual vehicle miles of travel (5.7% of total VMT in the   |
|                    | area). Mostly through traffic on Interstate 66 and Route 17.           |
| Major Sources      | There are two major sources in the County which is a natural gas       |
| -                  | fired simple cycle peaking electric generation stations. However,      |
|                    | these are new facilities that are controlled and subject to the        |
|                    | CSAPR utility control program. Total County point source               |
|                    | emission of both VOC and $NO_X$ are less than 100 tons/year.           |
| Geography          | County is located to the Southwest of the proposed nonattainment       |
|                    | area.  |
| Boundaries         | County is part of the Washington, DC-MD-VA MSA.                        |
| Level of Controls  | Currently subject to attainment permit and control requirements.       |
|                    | Emissions should be significantly reduced by regional and national     |
|                    | controls.  |



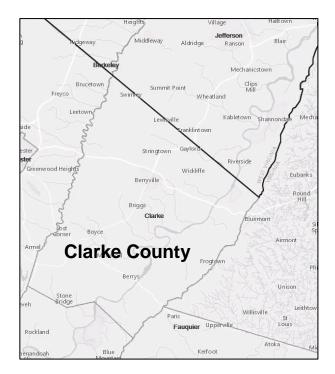
|                     | Analysis of Ozone Related Criteria  |
|---------------------|---|
| Emissions (2011)    | 1,597 tons/year VOC and 1,343 tons/year NO <sub><math>X</math></sub> (3.1% of ozone |
|                     |   |
| Furthering Demotion | precursor emissions in the study area).   |
| Emissions Density   | 0.021 tons per square mile.   |
| Population (2010)   | 46,689 – 123 per square mile (1.9% of the total population in the                   |
|                     | study area).  |
| Population Growth   | Population has grown to 49,432 in 2015, which represents only                       |
|                     | 1.2% of the total population growth expected in the study area.                     |
| Air Quality         | No monitor located in the County but ozone air quality is expected                  |
|                     | to be attainment based on closest monitored values.                                 |
| Commuting Patterns  | The majority of county workforce trips are internal. Most external                  |
| _                   | commutes are to other jurisdictions in the study area.                              |
| Annual VMT (2011)   | 530 million annual vehicle miles of travel (2.5% of total VMT in the                |
|                     | area). Mostly through traffic on Interstate 66 and Route 29.                        |
| Major Sources       | There is one major source of VOCs in the County which is a                          |
| -                   | cabinet manufacturing facility. However, VOCs do not contribute                     |
|                     | significantly to ozone formation in the area. Total County point                    |
|                     | source emission of both VOC and $NO_x$ are less than 260 tons/year.                 |
| Geography           | County is located to the Southwest of the proposed nonattainment                    |
|                     | area.   |
| Boundaries          | County is part of the Washington, DC-MD-VA MSA.                                     |
| Level of Controls   | Currently subject to attainment permit and control requirements.                    |
|                     | Emissions should be significantly reduced by regional and national                  |
|                     | controls.   |
| L                   |   |



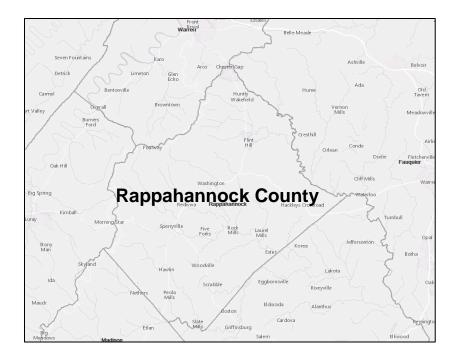
| <b>System Sector Sect</b> |
|--|
| ursor emissions in the study area).  |
|  |
|  |
| 9 tons/day/ square mile.   |
| 75–176 per square mile (1.5% of the total population in the  |
| y area).   |
| lation has grown to 39,083 in 2015, which represents only  |
| of the total population growth expected in the study area.   |
| nonitor located in the County but ozone air quality is expected  |
| e attainment based on closest monitored values.  |
| majority of county workforce trips are internal. Most external   |
| mutes are to other jurisdictions in the study area and the   |
| chester area.  |
| 5 million annual vehicle miles of travel (2.0% of total VMT in   |
| area). Mostly through traffic on Interstate 66 and Route15.  |
| e is one major source in the County which is a natural gas   |
| bined cycle electric generating station. This EGU did not  |
| , , ,  |
| mence commercial operation until 2014. However, this new   |
| ty is highly controlled and subject to the CSAPR utility control   |
| ram. Total County point source emission of both VOC and  |
| are less than 100 tons/year.   |
| nty is located to the Southwest of the proposed nonattainment  |
| ·  |
| nty is part of the Washington, DC-MD-VA MSA.   |
| ently subject to attainment permit and control requirements.   |
| ssions should be significantly reduced by regional and national  |
| rols.  |
|  |



|                    | Analysis of Ozone Related Criteria   |
|--------------------|--|
| Emissions (2011)   | 900 tons/year VOC and 924 tons/year NO <sub>X</sub> (2.0% of ozone   |
|                    | precursor emissions in the study area).  |
| Emissions Density  | 0.028 tons/day/ square mile  |
| Population (2010)  | 25,584 – 131 per square mile (1.0% of the total population in the study area).   |
| Population Growth  | Population has decreased to 25,515 in 2015, which represents<br>only 0.9% of the total population growth expected in the study<br>area.  |
| Air Quality        | No monitor located in the County but ozone air quality is expected<br>to be attainment based on closest monitored values.  |
| Commuting Patterns | The majority of county workforce trips are internal. Most external commutes are to the Fredericksburg area and southern Maryland.  |
| Annual VMT (2011)  | 305.8 million annual vehicle miles of travel (1.4% of total VMT in the area). Mostly from traffic on Route 301.  |
| Major Sources      | There is one major source in the County which is a coal-fired electric generating station. However, this facility is highly controlled and subject to MACT and the CSAPR utility control program. Total County point source emission of both VOC and $NO_x$ are less than 500 tons/year. |
| Geography          | County is located to the Southeast of the proposed nonattainment area.   |
| Boundaries         | County is part of the Washington, DC-MD-VA MSA.  |
| Level of Controls  | Currently subject to attainment permit and control requirements.<br>Emissions should be significantly reduced by regional and national<br>controls.  |



|                    | Analysis of Ozone Related Criteria   |  |  |  |  |  |  |
|--------------------|--|--|--|--|--|--|--|
| Emissions (2011)   | 666 tons/year VOC and 615 tons/year NO <sub><math>\chi</math></sub> (1.4% of ozone precursor |  |  |  |  |  |  |
|                    | emissions in the study area).  |  |  |  |  |  |  |
| Emissions Density  | 0.020 tons/day/ square mile.   |  |  |  |  |  |  |
| Population (2010)  | 14,034 – 80 per square mile (0.6% of the total population in the study area)                 |  |  |  |  |  |  |
| Population Growth  | Population has grown to 14,363 in 2015, which represents only 0.1% of the                    |  |  |  |  |  |  |
|                    | total population growth expected in the study area.  |  |  |  |  |  |  |
| Air Quality        | No monitor located in the County but ozone air quality is expected to be                     |  |  |  |  |  |  |
|                    | attainment based on closest monitored values.  |  |  |  |  |  |  |
| Commuting Patterns | The majority of county workforce trips are external commutes to other                        |  |  |  |  |  |  |
|                    | jurisdictions in the study area.   |  |  |  |  |  |  |
| Annual VMT (2011)  | 275.5 million annual vehicle miles of travel (1.3% of total VMT in the area).                |  |  |  |  |  |  |
|                    | Mostly through traffic on Interstate 66 and Route 29 and Route 17.                           |  |  |  |  |  |  |
| Major Sources      | There are no major point sources in the County. Total County point source                    |  |  |  |  |  |  |
|                    | emission of both VOC and $NO_X$ are less than 50 tons/year.                                  |  |  |  |  |  |  |
| Geography          | County is located to the Southeast of the proposed nonattainment area.                       |  |  |  |  |  |  |
| Boundaries         | County is part of the Washington, DC-MD-VA MSA.  |  |  |  |  |  |  |
| Level of Controls  | Currently subject to attainment permit and control requirements. Emissions                   |  |  |  |  |  |  |
|                    | should be significantly reduced by regional and national controls.                           |  |  |  |  |  |  |



| Analysis of Ozone Related Criteria |   |  |  |  |  |  |
|------------------------------------|---|--|--|--|--|--|
| Emissions (2011)                   | 307 tons/year VOC and 209 tons/year NO <sub>X</sub> (0.6% of ozone    |  |  |  |  |  |
|                                    | precursor emissions in the study area).                               |  |  |  |  |  |
| Emissions Density                  | 0.005 tons/day/ square mile.  |  |  |  |  |  |
| Population (2010)                  | 7,373 - 28 per square mile (0.3% of the total population in the       |  |  |  |  |  |
|                                    | study area).  |  |  |  |  |  |
| Population Growth                  | Population has grown to 7,378 in 2015, which represents only          |  |  |  |  |  |
|                                    | 0.0% of the total population growth expected in the study area.       |  |  |  |  |  |
| Air Quality                        | No monitor located in the County but ozone air quality is expected    |  |  |  |  |  |
|                                    | to be attainment based on closest monitored values.                   |  |  |  |  |  |
| Commuting Patterns                 | The majority of county workforce trips are internal. Most external    |  |  |  |  |  |
|                                    | commutes are to other jurisdictions in the study area.                |  |  |  |  |  |
| Annual VMT (2011)                  | 94.4 million annual vehicle miles of travel (0.4% of total VMT in the |  |  |  |  |  |
|                                    | area). Mostly through traffic on Route 522 and 211.                   |  |  |  |  |  |
| Major Sources                      | There are no major point sources in the County. Total County point    |  |  |  |  |  |
|                                    | source emission of both VOC and $NO_X$ are less than 10 tons/year.    |  |  |  |  |  |
| Geography                          | County is located to the Southwest of the proposed nonattainment      |  |  |  |  |  |
|                                    | area.   |  |  |  |  |  |
| Boundaries                         | County is part of the Washington, DC-MD-VA MSA.                       |  |  |  |  |  |
| Level of Controls                  | Currently subject to attainment permit and control requirements.      |  |  |  |  |  |
|                                    | Emissions should be significantly reduced by regional and national    |  |  |  |  |  |
|                                    | controls.   |  |  |  |  |  |

## Appendix A – Preliminary 2014-2016 Virginia Ozone 8-hour Ozone Data Virginia Department of Environmental Quality 2014-2016 Fourth Highest Daily Maximum Ozone 8-hour Averages

|  | Units,<br>Updated |      |   |      |                | 0              |
|--|-------------------|------|---|------|----------------|----------------|
|  |                   |      |   | (    | through 9/25/1 | 16)            |
| Monitoring Sites   | AIRS ID           | 2014 |   | 2015 | 2016           | 3-year average |
| Wythe Co.  | 511970002         | 64   |   | 58   | 62             | 61             |
| Rockbridge Co.   | 511630003         | 58   |   | 56   | 60             | 58             |
| Page Co.   | 511390004         | 58   |   | 59   | Disc           | 58             |
| Fauquier Co.   | 510610002         | 59   |   | 56   | 63             | 59             |
| Caroline Co.   | 510330001         | 61   |   | 62   | 62             | 61             |
| Rockingham Co.   | 511650003         | 58   |   | 60   | 62             | 60             |
| Albemarle Co.  | 510030001         | 59   | 1 | 59   | 62             | 60             |
| Roanoke Area:  |                   |      |   |      |                |                |
| Roanoke Co.  | 511611004         | 60   |   | 62   | 64             | 62             |
| Frederick County Area:   |                   |      |   |      |                |                |
| Frederick Co.  | 510690010         | 59   |   | 61   | 65             | 61             |
| Richmond Area:   |                   |      |   |      |                |                |
| Chesterfield Co.   | 510410004         | 61   |   | 63   | 63             | 62             |
| Henrico Co.  | 510870014         | 62   | 1 | 64   | 66             | 64             |
| Hanover Co.  | 510850003         | 62   |   | 61   | 65             | 62             |
| Charles City Co.   | 510360002         | 66   |   | 59   | 65             | 63             |
| Hampton Roads Area:  |                   |      |   |      |                |                |
| Hampton  | 516500008         | 61   |   | 65   | 68             | 64             |
| Suffolk - TCC  | 518000004         | 58   |   | 61   | 63             | 60             |
| Suffolk - Holland  | 518000005         | 63   |   | 60   | 61             | 61             |
| Fredericksburg Area:   |                   |      |   |      |                |                |
| Stafford Co.   | 511790001         | 62   |   | 63   | 66             | 63             |
| Northern Virginia Area:  |                   |      |   |      |                |                |
| Loudoun Co.  | 511071005         | 63   |   | 71   | 68             | 67             |
| Prince William Co.   | 511530009         | 62   |   | 67   | 67             | 65             |
| Arlington Co.  | 510130020         | 71   |   | 73   | 72             | 72             |
| Fairfax Co Lee Park  | 510590030         | 65   |   | 72   | 73             | 70             |
| Shenandoah National Park - Madison Co.<br>(Site operated by the National Park Service) | 511130003         | 60   |   | 63   | 66             | 63             |
| Ciles Co. CASTNET  | 510710001         | 62   |   | 62   | 60             | 60             |

Sites in italics exceeded the 8-hour ozone standard for 2014-2016

Giles Co. CASTNET

Prince Edward Co. CASTNET

62

63

63

57

62

60

510719991

511479991

62

60

#### Appendix B: Data Table for Virginia Nonattainment Designation Ozone Factors Analysis

| County/City <sup>1</sup> | Land<br>Area <sup>2</sup> | Рорг      | ulation <sup>3</sup> | Growth Rate |        | nual<br>sions <sup>4</sup> | Total  | Area<br>Emissions | Area<br>Population | Population<br>Growth for<br>Area | Combined<br>Average | Emission<br>Density | Population<br>Density | Vehicle<br>miles<br>Travelled <sup>5</sup> | Vehicle<br>miles<br>Travelled | Certified 2013-<br>2015 Design<br>Values | Preliminary/<br>Uncertified<br>2014-2016<br>Design<br>Values |
|--------------------------|---------------------------|-----------|----------------------|-------------|--------|----------------------------|--------|-------------------|--------------------|----------------------------------|---------------------|---------------------|-----------------------|--|-------------------------------|--|--|
|                          |                           |           |                      |             | NOX    | VOC                        |        |                   |                    |                                  |                     | ton/perday/sq.      | No/sq.                | Annual                                     | Percent                       | ppb                                      | nnh  |
|                          | Sq.<br>Miles              | 2010      | 2015                 | Percent     |        | tons/year                  | •      |                   | -                  | -                                |                     | mile                | mile                  | Annuar                                     | Fercent                       | ppp                                      | ррь  |
| ALEXANDRIA CITY          | 15.03                     | 139,966   | 153,511              | 1.86        | 2,266  | 2,244                      | 4,510  | 4.8               | 5.8                | 6.0                              | 5.5                 | 0.822               | 9,314                 | 776,631,863                                | 3.6                           | N/A                                      | N/A  |
| ARLINGTON COUNTY         | 25.97                     | 207,627   | 229,164              | 1.99        | 4,061  | 3,433                      | 7,493  | 8.0               | 8.6                | 9.5                              | 8.7                 | 0.790               | 7,994                 | 1,668,842,699                              | 7.7                           | 70                                       | 72   |
| CLARKE COUNTY            | 176.18                    | 14,034    | 14,363               | 0.46        | 615    | 666                        | 1,281  | 1.4               | 0.6                | 0.1                              | 0.7                 | 0.020               | 80                    | 275,483,696                                | 1.3                           | N/A                                      | N/A  |
| CULPEPER COUNTY          | 379.23                    | 46,689    | 49,432               | 1.15        | 1,343  | 1,597                      | 2,940  | 3.1               | 1.9                | 1.2                              | 2.1                 | 0.021               | 123                   | 530,145,141                                | 2.5                           | N/A                                      | N/A  |
| FAIRFAX COUNTY           | 390.97                    | 1,081,726 | 1,142,234            | 1.09        | 15,199 | 19,336                     | 34,534 | 37.0              | 44.6               | 26.6                             | 36.1                | 0.242               | 2,767                 | 9,884,211,505                              | 45.7                          | 68                                       | 70   |
| FAIRFAX CITY             | 6.24                      | 22,565    | 24,013               | 1.25        | 258    | 675                        | 933    | 1.0               | 0.9                | 0.6                              | 0.9                 | 0.410               | 3,617                 | 182,988,258                                | 0.8                           | N/A                                      | N/A  |
| FALLS CHURCH CITY        | 2.00                      | 12,332    | 13,892               | 2.41        | 121    | 288                        | 409    | 0.4               | 0.5                | 0.7                              | 0.5                 | 0.560               | 6,169                 | 56,374,487                                 | 0.3                           | N/A                                      | N/A  |
| FAUQUIER COUNTY          | 647.45                    | 65,203    | 68,782               | 1.07        | 3,377  | 3,003                      | 6,379  | 6.8               | 2.7                | 1.6                              | 3.7                 | 0.027               | 101                   | 1,236,123,735                              | 5.7                           | 58                                       | 59   |
| KING GEORGE<br>COUNTY    | 179.64                    | 23,584    | 25,515               | 1.59        | 924    | 900                        | 1,824  | 2.0               | 1.0                | 0.9                              | 1.3                 | 0.028               | 131                   | 305,783,532                                | 1.4                           | N/A                                      | N/A  |
| LOUDOUN COUNTY           | 515.56                    | 312,311   | 375,629              | 3.76        | 6,689  | 6,648                      | 13,338 | 14.3              | 12.9               | 27.9                             | 18.3                | 0.071               | 606                   | 2,489,966,360                              | 11.5                          | 66                                       | 67   |
| MANASSAS CITY            | 9.88                      | 37,821    | 41,764               | 2.00        | 466    | 791                        | 1,258  | 1.3               | 1.6                | 1.7                              | 1.5                 | 0.349               | 3,828                 | 257,068,406                                | 1.2                           | N/A                                      | N/A  |
| MANASSAS PARK CITY       | 2.53                      | 14,273    | 15,726               | 1.96        | 102    | 289                        | 391    | 0.4               | 0.6                | 0.6                              | 0.5                 | 0.422               | 5,633                 | 24,777,086                                 | 0.1                           | N/A                                      | N/A  |
| PRINCE WILLIAM<br>COUNTY | 336.40                    | 402,002   | 451,721              | 2.36        | 6,784  | 7,739                      | 14,523 | 15.6              | 16.6               | 21.9                             | 18.0                | 0.118               | 1,195                 | 3,394,199,629                              | 15.7                          | 65                                       | 65   |
| RAPPAHANNOCK<br>COUNTY   | 266.23                    | 7,373     | 7,378                | 0.01        | 209    | 307                        | 516    | 0.6               | 0.3                | 0.0                              | 0.3                 | 0.005               | 28                    | 94,398,473                                 | 0.4                           | N/A                                      | N/A  |
| WARREN COUNTY            | 213.47                    | 37,575    | 39,083               | 0.79        | 1,397  | 1,644                      | 3,041  | 3.3               | 1.5                | 0.7                              | 1.8                 | 0.039               | 176                   | 436,554,493                                | 2.0                           | N/A                                      | N/A  |
|                          | 3,167                     | 2,425,081 | 2,652,207            | 1.81        | 43,812 | 49,557                     | 93,369 | 100.0             | 100.0              | 100.0                            |                     | 0.081               | 766                   | 21,613,549,363                             | 100                           |  |  |

1) City of Fredericksburg, Stafford County, and Spotsylvania County were not included in the analyses because these jurisdictions are located in a separate regional transportation planning organization and there are no monitors in these jurisdictions in violation of the 2015 ozone NAAQS.

2) Dataset provided by EPA to support the five-factor analysis: County Population (excel spreadsheet) downloaded from https://www.epa.gov/ozone-designations/ozone-designations-guidance-and-data

3) Dataset provided by EPA to support the five-factor analysis: County Population (excel spreadsheet) downloaded from https://www.epa.gov/ozone-designations/ozone-designations-guidance-and-data

4) 2011-2011 NEI V2. Estimates of emissions and percentages include only anthropogenic sources.

5) Dataset provided by EPA to support the five-factor analysis: Vehicle Miles Traveled (excel spreadsheet) downloaded from https://www.epa.gov/ozone-designations/ozone-designations-guidance-and-data

# **Enclosure III**

48. In §81.347, the table entitled "Virginia- 2015 Ozone 8-Hour Ozone NAAQS (Primary and secondary)" is revised to read as follows:

| Designated Area               | Designation               | Classification |
|-------------------------------|---------------------------|----------------|
| Designated Area               | Туре                      | Туре           |
| Washington, DC-MD-VA          | Nonattainment             | Marginal       |
| Arlington County              |                           | -              |
| Fairfax County                |                           |                |
| Loudoun County                |                           |                |
| Prince William County         |                           |                |
| Alexandria City               |                           |                |
| Fairfax City                  |                           |                |
| Falls Church City             |                           |                |
| Manassas City                 |                           |                |
| Manassas Park City            |                           |                |
| Eastern Tennessee-SW Virginia |                           |                |
| Interstate                    | Unclassifiable/Attainment |                |
| Bland County                  |                           |                |
| Buchanan County               |                           |                |
| Carroll County                |                           |                |
| Dickerson County              |                           |                |
| Grayson County                |                           |                |
| Lee County                    |                           |                |
| Russell County                |                           |                |
| Scott County                  |                           |                |
| Smyth County                  |                           |                |
| Tazewell County               |                           |                |
| Washington County             |                           |                |
| Wise County                   |                           |                |
| Wythe County                  |                           |                |
| Bristol City                  |                           |                |
| Galax City                    |                           |                |
| Norton City                   |                           |                |
| Central Virginia Intrastate   | Unclassifiable/Attainment |                |
| Amelia County                 |                           |                |
| Amherst County                |                           |                |
| Appomattox County             |                           |                |
| Bedford County                |                           |                |
| Brunswick County              |                           |                |
| Buckingham County             |                           |                |
| Campbell County               |                           |                |
| Charlotte County              |                           |                |
| Cumberland County             |                           |                |
| Franklin County               |                           |                |

| Halifax County           |                           |  |
|--------------------------|---------------------------|--|
| Henry County             |                           |  |
| Lunenburg County         |                           |  |
| Mecklenburg County       |                           |  |
| Nottoway County          |                           |  |
| Patrick County           |                           |  |
| Pittsylvania County      |                           |  |
| Prince Edward County     |                           |  |
| Bedford City             |                           |  |
| Danville City            |                           |  |
| Lynchburg City           |                           |  |
| Martinsville City        |                           |  |
| South Boston City        |                           |  |
| Hampton Roads Intrastate | Unclassifiable/Attainment |  |
| Isle of Wight County     | Cherassinaole/Attainment  |  |
|                          |                           |  |
| James City County        |                           |  |
| Southampton County       |                           |  |
| York County              |                           |  |
| Chesapeake City          |                           |  |
| Franklin City            |                           |  |
| Hampton City             |                           |  |
| Newport News City        |                           |  |
| Norfolk City             |                           |  |
| Poquoson City            |                           |  |
| Portsmouth City          |                           |  |
| Suffolk City             |                           |  |
| Virginia Beach City      |                           |  |
| Williamsburg City        |                           |  |
| NE Virginia Intrastate   | Unclassifiable/Attainment |  |
| Accomack County          |                           |  |
| Albemarle County         |                           |  |
| Caroline County          |                           |  |
| Culpeper County          |                           |  |
| Essex County             |                           |  |
| Fauquier County          |                           |  |
| Fluvanna County          |                           |  |
| Gloucester County        |                           |  |
| -                        |                           |  |
| Greene County            |                           |  |
| King and Queen County    |                           |  |
| King William County      |                           |  |
| Lancaster County         |                           |  |
| Louisa County            |                           |  |
| Madison County           |                           |  |
| Matthews County          |                           |  |
| Middlesex County         |                           |  |
| Nelson County            |                           |  |
| Northampton County       |                           |  |

| Northumberland County             |                           |  |
|-----------------------------------|---------------------------|--|
| Orange County                     |                           |  |
| Rappahannock County               |                           |  |
| Richmond County                   |                           |  |
| Spotsylvania County               |                           |  |
|                                   |                           |  |
| Stafford County                   |                           |  |
| Westmoreland County               |                           |  |
| Charlottesville City              |                           |  |
| City of Fredericksburg            |                           |  |
| State Capitol Intrastate          | Unclassifiable/Attainment |  |
| Charles City County               |                           |  |
| Chesterfield County               |                           |  |
| Dinwiddie County                  |                           |  |
| Goochland County                  |                           |  |
| -                                 |                           |  |
| Greensville County                |                           |  |
| Hanover County                    |                           |  |
| Henrico County                    |                           |  |
| New Kent County                   |                           |  |
| Powhatan County                   |                           |  |
| Prince George County              |                           |  |
| Surry County                      |                           |  |
| Sussex County                     |                           |  |
| Colonial Heights City             |                           |  |
| Emporia City                      |                           |  |
|                                   |                           |  |
| Hopewell City                     |                           |  |
| Petersburg City                   |                           |  |
| Richmond City                     |                           |  |
| Valley of Virginia Intrastate     | Unclassifiable/Attainment |  |
| Alleghany County                  |                           |  |
| Augusta County                    |                           |  |
| Bath County                       |                           |  |
| Botetourt County                  |                           |  |
| Craig County                      |                           |  |
| Floyd County                      |                           |  |
|                                   |                           |  |
| Frederick County                  |                           |  |
| Giles County                      |                           |  |
| Highland County                   |                           |  |
| Montgomery County                 |                           |  |
| Page County                       |                           |  |
| Pulaski County                    |                           |  |
| Roanoke County                    |                           |  |
| Rockbridge County                 |                           |  |
| Rockingham County                 |                           |  |
| Shenandoah County                 |                           |  |
| •                                 |                           |  |
| Warren County<br>Buone Viete City |                           |  |
| Buena Vista City                  |                           |  |
| Clifton Forge City                |                           |  |

| Covington City<br>Harrisonburg City<br>Lexington City<br>Radford City<br>Roanoke City<br>Salem City<br>Staunton City<br>Waynesboro City<br>Winchester City |  |
|--|--|
|  |  |
|  |  |