

MEMORANDUM

TO: Transportation Conformity Sub-Committee
FROM: Sunil Kumar, COG Environmental Engineer
SUBJECT: Ozone Planning Options for Washington Region (2015 Ozone NAAQS)
DATE: January 29, 2021

Purpose

The purpose of this memo is to outline the potential alternative choices the region faces regarding air quality planning activity for the 2015 ozone National Ambient Air Quality Standard (NAAQS).

Background

The US EPA (EPA) designated the Washington region as a Marginal nonattainment (NAA) area for the 2015 ozone NAAQS on August 3, 2018.¹ Being a Marginal nonattainment area, the region was not required to submit attainment demonstration State Implementation Plan (SIP). As a result, no new motor vehicle emissions budgets (MVEBs) were established for the region. The region's design value needs to be at or below 70 PPB by August 3, 2021 in order to attain the NAAQS. Since this date is in the middle of the ozone season 2021, the design value needs to be based on data for the full ozone season periods of 2018 through 2020.

Based on the draft design value for the period 2018-2020 (71 parts per billion), the region did not attain the NAAQS. Having missed the attainment deadline, the region now has to decide on the next course of action.

Potential Ozone Planning Options

Following are the three planning options the Washington region could consider moving forward along with the implications for each option.

1. Voluntary Reclassification (Bump Up)

The Washington region is currently a Marginal ozone NAA for the 2015 ozone NAAQS. If the region voluntarily requests for a reclassification (bump up), EPA will bump it up to a Moderate ozone NAA.

Following are the implications for a voluntary bump up:

- This will extend the attainment date for the 2015 ozone NAAQS to August 3, 2024 (attainment Design Value to be based on 2021-2023 data).

¹ Federal Register, Vol. 83, No. 107, June 4, 2018

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- Following bump up, Moderate ozone NAA requirements would apply immediately. To meet those requirements, following documents listed below would need to be developed and submitted:
 - I. Demonstration of 15% Reasonable Further Progress (RFP) VOC/NOx emission reduction over 6 years (2017-2023; assuming RFP baseline year to be 2017) - *Due likely January 2023*
 - The above-mentioned expected submittal date is based on the assumption that EPA will provide the same timeframe to develop SIPs for reclassified Moderate ozone NAAs for the 2015 ozone NAAQS as it previously provided to reclassified moderate NAAs for the 2008 ozone NAAQS. EPA provided an additional 1.5 years (until January 2017) to submit RFP/Attainment SIPs for reclassified Moderate NAAs compared to initial moderate NAAs (until July 2015) for the 2008 ozone NAAQS.
Source: <https://www.epa.gov/ground-level-ozone-pollution/ozone-naaqs-timelines>
 - Recently submitted Base Year 2017 inventories could be used for the baseline year for RFP calculation purposes (need to update onroad/nonroad inventories using MOVES3 or the latest available mobile model version?). RFP milestone year 2023 inventory would need to be developed for all four sources.
 - II. SIP demonstrating attainment by 2023 - *Due likely January 2023*
 - Emissions inventory for attainment year 2023 (inventory developed for RFP purposes will be used)
 - Reasonably Available Control Measures (RACM) - Enforceable emission limits & other control measures, means, and techniques as needed that may also include emission sources outside of NAA that are within state's jurisdiction
 - Mobile and stationary source controls (as needed)
 - Contingency measures for failure to attain
 - New 2023 MVEBs based on MOVES or the latest available mobile model version (Will replace the current MBEs developed as part of 2008 ozone NAAQS maintenance plan when found adequate or approved by EPA)
 - III. Reasonably Available Control Technology (RACT) SIP for Major/CTG sources – To be submitted by OTR states by August 3, 2020
 - IV. Nonattainment New Source Review (NNSR) SIP - To be submitted by states by August 3, 2021

2. 1-Year Extension

Following are the implications if the Washington region opts for a 1-year extension of the attainment deadline:

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- This will extend the attainment date to August 3, 2022 (attainment DV to based on 2019-2021 data) and will not trigger requirements to submit SIPs.
- However, if the region does not start developing SIPs for the Moderate ozone NAA on its own and fails to attain by October 2021 (based on draft 2019-2021 DV data), it will have a relatively short amount of time (about a year) left to develop and submit those SIPs (likely due by January 2023) even if it does not wait for a formal EPA reclassification action. Waiting any further to develop SIPs until after a formal EPA reclassification (likely after May 1, 2022) will not allow sufficient time to do so.

Therefore, it is advisable that states start developing SIPs now even as they request a 1-year extension of the attainment deadline. This will allow timely development and submittal of SIPs in case the region fails to attain by the extended deadline and needs to submit those SIPs at a short notice following EPA's bump up action.

3. No Regional Action

Following are the implications if the Washington region does not opt for either option (voluntary bump up or 1-year extension):

- In this scenario, EPA may reclassify the region to a Moderate ozone NAA any time after May 1, 2021 (states' deadline to submit QA/QC data).
- Depending on the timeline of EPA's action on reclassification, the region will likely have 1.5 years or less to submit SIPs (likely due January 2023) if it chooses to wait for the EPA action.
- If the region waits for the EPA bump up action to develop SIPs and EPA delays its action until October 2021 (probably to consider draft 2019-2021 Design Value data) and the draft DV data does not indicate attainment, then the region will have only about a year to submit SIPs, which may not be sufficient.

Therefore, it is advisable that the region starts developing SIPs now even if it does not opt for the first two options. This will allow timely development and submittal of SIPs in case the region fails to attain by the end of 2021, gets bumped up to a Moderate ozone NAA, and as a result needs to submit SIPs at a short notice.

Conclusion

Regardless of whether the region opts for the voluntary bump-up, 1-year extension, or simply chooses not to take either of the two actions, it needs to start working on RFP and attainment demonstration SIPs as soon as possible given rather short timeframe (about 2 years from January 2021) available to develop and submit them in case they are needed. This will ensure the region's ability to submit those SIPs in a timely fashion if it is required to do so.