

**Partial Response from EPA to the List of Questions &
Status of Base Year 2017 Emissions Inventory**

(2015 Ozone NAAQS)

EPA Response

Q1 (Milestone year for base year) – No response yet.

Q2 (Time period & Pollutants) – Ozone season day emissions for VOC and NO_x. CO is not required for submittal for the base year emission inventory, attainment plan, or redesignation request & maintenance plan.

Q3 (Vehicle Registration data) - No response yet.

Q4 (Schedule of pre-Hearing version of base year emissions inventory document submittal to EPA) – The list of question sent to EPA mentions January/February 2020 as the submittal date. The NEI 2017 final point and draft non-point source emissions inventories will be ready by November 1, 2019. The NEI final non-point source emissions inventories will be ready by April 30, 2020. Emissions inventories and/or input data submitted as part of the NEI 2017 effort will also be used for the base year submittal. In light of the above NEI 2017 schedule, EPA asked whether the Washington region should consider extending the pre-hearing document submittal schedule to include the final non-point NEI 2017 emissions inventories. Members need to discuss this before MWAQC staff can respond to EPA.

Status of Base Year 2017 Emissions Inventory

EPA designated the Washington region on August 3, 2018 as a marginal nonattainment area for the 2015 ozone NAAQS. The final implementation rule published on December 6, 2018 for the 2015 ozone NAAQS requires the submission of comprehensive base year emissions inventories for point, nonpoint (area), on-road, and nonroad sources.

Point source – Draft and final data will be available on April 1, 2019 and April 1, 2020 respectively. Final EPA version would include Mercury and HAPs emissions. Is draft emission data submitted by states on 4/1/2019 not good enough for BY submittal since it would contain VOC and NO_x emissions required for BY submittal?

Non-Point source – Draft and final data will be available on November 1, 2019 and April 1, 2020 respectively. Final EPA version is expected to include QA/QC'd non-point data (bin 3), which need reconciliation with point source data. Draft version of bin 3 data will be supplied by states by January 1, 2020. Is draft emission data submitted by states on 4/1/2019 not good enough for BY submittal? Looking at Table A (preliminary schedule for base year emissions inventory development and submittal), we can send the pre-hearing BY document to EPA by January 2020 only if we could use the draft data. Extending the submittal in April will make it extremely difficult to comply with the BY submittal deadline of August 3, 2020.

On-road and nonroad source emissions inventories – The most current MOVES2014b model version will be used to develop emissions inventories for both on-road and nonroad sources.

States provided inputs – Fuel, I/M programs, and control programs

