Questions re. Base Year Emissions Inventory Submittal Requirements &

EPA’s Response

(2015 Ozone NAAQS)

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. We have the following questions concerning the base year emissions inventory requirements.

1. Milestone year for base year – The final implementation rule provides two options for selecting the milestone year for the base year. The first option is the most recent calendar year for which a complete triennial inventory is required to be submitted to EPA. The second option is the calendar year of the nonattainment designation. The Washington region was designated as a nonattainment area in 2018.

For the Washington DC-MD-VA nonattainment region, the year 2017 seems a more appropriate option. The District, Maryland, and Virginia are currently working with EPA to submit emissions inventories for the year 2017 as part of the National Emissions Inventory (NEI) effort. The final NEI 2017 data and information is expected to be published by EPA by September 15, 2019 for point, on-road/nonroad, and event sources and by February 28, 2020 for non-point sources. The region plans to use these inventories for the base year submittal. However, if the above schedule is delayed for any reason, then the region will use the draft data available by these dates. Regarding the year 2018, no prior data and information exists, and it will take significant time to develop them. Therefore, the Washington DC-MD-VA nonattainment region wishes to opt for 2017 as the milestone year for the base year. Do you agree with our selection of the base year option?

*EPA Response (July 1, 2019) - Yes, 2017 is the default baseline year under the 2015 O3 SIP Requirements rule (40 CFR 51.1315) and can be used.*

1. Time period of emissions data & pollutants - The final implementation rule requires the base year emissions inventory to be submitted for an average day’s emissions for a typical ozone season work weekday for VOC and NOx. Since annual emissions are used for developing ozone season day emissions for a few source categories (e.g., a few point and area sources), we understand that those annual emissions would also need to be included in the inventory. Though CO emissions are not required as part of the base year emissions inventory submittal, we would like to include them for use at a later date when the Washington DC-MD-VA nonattainment region opts to submit a redesignation request and a maintenance plan for the 2015 ozone NAAQS. In a nutshell, the region plans to submit ozone season day emissions inventories for VOC, NOx, and CO along with annual emissions for these pollutants for those sources where annual emissions are used to develop ozone season day emissions. Please let us know if the above time period of emissions and the list of pollutants suffices the base year emissions inventory requirements.

*EPA Response (July 1, 2019) – Where annual VOC and NOx (or CO) emissions are used as a starting point for temporal allocation to/estimation of ozone season day emissions, the annual data must be in the supporting technical support to allow EPA review of the ozone season day emissions allocation methodologies.*

*As discussed, CO is not needed in any form for an ozone planning base year inventory SIP. If submitted, EPA will approve a 2017 CO inventory as EPA has done in the past. Refer to July 23, 2015 (80 FR 43625).*

*Previous EPA Response (March 21, 2019) – Ozone season day emissions are required for VOC and NOx. CO is not required for submittal for the base year emission inventory, attainment plan, or redesignation request & maintenance plan. Where annual emissions are used as a starting point for temporal allocation to/estimation of ozone season day emissions, the annual data must be in the supporting technical support to allow EPA review of the ozone season day emissions estimation methodologies.*

*MWAQC-TAC Decision (April 9) –*

*Pollutants: Include CO emissions in addition to VOC and NOx emissions. EPA in the past always required CO emissions for the base year emissions inventory, attainment plan, or redesignation request & maintenance plan.*

*Time Period:*

1. *Point & non-point sources – Ozone season day. In addition, annual emissions also required for those sources where annual emissions are used as a starting point for temporal allocation to/estimation of ozone season day emissions.*

*ii. On-road, and nonroad sources - Ozone season day*

1. Vehicle Registration Data (VIN) - The VIN data is the basis for a few inputs for the on-road emissions model. The District, Maryland, and Virginia are planning to submit the 2017 VIN data for the on-road model inputs for the NEI 2017 submittal. However, it is important to note that the District, Maryland and Virginia used different approaches for developing their inputs to their 2017 VIN data. The National Capital Region Transportation Planning Board (TPB) recently conducted a regionally consistent decoding of the 2016 VIN data for the District, Maryland and Virginia for the region’s transportation conformity analysis. Since it takes significant time and resources to process the raw VIN data and develop it in a consistent on-road model ready format, would it be possible to use the already developed TPB regionally consistent 2016 VIN data (extrapolated to 2017) to meet the deadline for the base year emissions inventory submittal? Also, if the 2016 VIN data is used for the 2017 emissions inventory, would EPA require that the base year inventory for on-road emissions be recalculated and resubmitted using 2017 VIN data in the future when the region develops a redesignation request/maintenance plan or an attainment SIP (if the region is redesignated as a moderate nonattainment area)?

*EPA Response (July 1, 2019) – Region III has consulted with OTAQ. In general, MOVES/inventory input data should be less than 5 years old – whether VIN data or other input data. We do not have any objection to use of the TPB regionally consistent 2016 decoding data (extrapolated to 2017).*

*From time to time, the area will need to update VIN related and other data under the conformity rule (40 CFR 93.110) for conformity determinations.*

*EPA has not required the base year inventory to be redone due to better information or mobile model changes. States are of course free to update at their option the base year inventory to incorporate better information, methods or models which later becomes available.*

*As far as some future SIP which contains motor vehicle emissions budgets and projected attainment year (as in an attainment demonstration) or outyears (maintenance plan) inventories, the latest VIN and other data should be used. If at such time a new planning projection inventory needs to be developed, regionally consistent 2017 data are the latest being used for conformity then the 2017 data should be used for future inventory projections such as a redesignation & maintenance plan (attainment year inventory, maintenance plan’s projected interim and end year inventories) or reasonable further progress milestone year or attainment year for reasonable further progress plans and an attainment demonstration, respectively.*

1. Due to the complexities of developing the inputs for the 2017 NEI and the potential for EPA to move back various dates for 2017 NEI data availability, VDEQ, MDE, DOEE, and MWAQC staff do not expect to have a draft base year inventory ready for preliminary review by EPA until January or February 2020. Is this timeframe acceptable to EPA? Also, how long does EPA expect would be needed for the preliminary review? The state agencies and MWAQC staff request that any comments EPA develops during the preliminary review be supplied in writing (email is acceptable) to facilitate response and edits.

*EPA Response (July 1, 2019) – EPA Region 3 discussed timing of the draft base year emissions inventory with the District, Maryland, and Virginia during our 105 grant mid-year discussions. EPA agreed to move the date of the comprehensive draft of the draft base year emissions inventory to the February 2020 timeframe. EPA and the States will set the exact date through the Section 105 Grants during FY2020 workplan development process.*

1. Other pertinent information and requirements – Please let us know about any other information or requirements that are not mentioned above.

*EPA Response (July 1, 2019) - We have regular discussions with the state / local agencies and provide guidance as we receive it from Headquarters. Please feel free to reach out to EPA with any other questions.*

