

Appendix E

Public Hearing Notices, Comments, and Responses

DDOE Notice

DISTRICT DEPARTMENT OF THE ENVIRONMENT NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD ON AIR QUALITY ISSUES

State Implementation Plan Revision - 40 C.F.R. Part 52, Subpart J

Notice is hereby given that a public hearing will be held on Monday, May 12, 2014, at 5:45 p.m. in Room 555 at 1200 First Street NE, 5th Floor, in Washington, D.C. 20002. This hearing provides interested parties an opportunity to comment on the proposed revision to the District of Columbia's (District) State Implementation Plan (SIP), found at 40 C.F.R. Part 52 Subpart J.

The District was designated by the U.S. Environmental Protection Agency (EPA) as being in marginal nonattainment of the 2008 8-hour ozone national ambient air quality standard (NAAQS), effective on July 20, 2012 (77 Fed. Reg. 30088, May 21, 2012). To meet requirements of Clean Air Act § 172(c)(3) for marginal areas, a base year emissions inventory must be submitted to EPA as a SIP revision no later than two years after designation (42 U.S. Code § 7511a(a)(1)). Once the District has completed its procedures, the inventory and supporting documents will be submitted to EPA as a SIP revision.

Copies of the proposed SIP revision are available for public review during normal business hours at the offices of the District Department of the Environment (DDOE), 1200 First Street NE, 5th Floor, Washington, DC 20002, and on-line at <http://ddoe.dc.gov/>.

Interested parties wishing to testify at this hearing must submit in writing their names, addresses, telephone numbers and affiliation, if any, to Mr. William Bolden at the DDOE address above or at william.bolden@dc.gov by 4:00 p.m. on May 12, 2014. Interested parties may also submit written comments to Ms. Jessica Daniels, Monitoring and Assessment Branch, Air Quality Division, DDOE, at the same address or by email at jessica.daniels@dc.gov. Questions about this SIP revision should be directed to Mr. Rama S. Tangirala by phone at 202-535-2989 or email at rama.tangirala@dc.gov, or Ms. Daniels at 202-741-0862 or jessica.daniels@dc.gov. No comments will be accepted after May 12, 2014.

VDEQ Notice

DEPARTMENT OF ENVIRONMENTAL QUALITY Public Notice – Air Quality Plan

Notice of action: The Department of Environmental Quality (DEQ) is seeking comments and announcing a public hearing on a proposed 2011 base year inventory for precursors to the pollutant ozone, which are carbon monoxide (CO), nitrogen oxides (NO_x), and volatile organic compounds (VOC) in the Metropolitan Washington, DC-MD-VA 2008 Ozone Nonattainment Area. The Commonwealth intends to submit the inventory as a revision to the Commonwealth of Virginia State Implementation Plan (SIP) in accordance with the federal Clean Air Act. The SIP is the plan developed by the Commonwealth in order to fulfill its responsibilities under the Act to attain and maintain the ambient air quality standards promulgated by the U.S. Environmental Protection Agency (EPA).

Purpose of notice: DEQ is seeking comments on the overall 2011 inventory for the Northern Virginia portion of the Metropolitan Washington, DC-MD-VA 2008 Ozone Nonattainment Area, which consists of the counties of Arlington, Fairfax, Loudoun, and Prince William and the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park.

Public comment period: March 24 to April 23, 2014.

Public hearing: A public hearing will be conducted in Conference Room 2, DEQ Northern Region Office, 13901 Crown Court, Woodbridge, Virginia, at 10:00 am on April 22, 2014. A map and directions maybe found at <http://www.deq.virginia.gov/Locations/NorthernRegionalOffice.aspx>.

Description of proposal: The proposed 2011 base year inventory was prepared by the Metropolitan Washington Air Quality Committee (MWAQC), which consists of elected officials from the affected localities and representatives of state transportation and air quality planning agencies.

The proposal consists of a comprehensive inventory of actual emissions from all sources of relevant pollutants for the base year 2011. This inventory, once finalized, will be the basis for any future planning exercises that have as a goal compliance with the 2008 ozone national ambient air quality standard (NAAQS).

Federal information: This notice is being given to satisfy the public participation requirements of federal regulations (40 CFR 51.102). The proposed inventory and supporting technical documents will be submitted as a revision to the Commonwealth of Virginia SIP under § 110(a) of the federal Clean Air Act in accordance with 40 CFR 51.104.

How to comment: DEQ accepts written comments by email, fax, and postal mail. In order to be considered, comments must include the full name, address, and telephone number of the person commenting and be received by DEQ no later than the last day of the comment period. Both oral and written comments are accepted at the public hearing. DEQ prefers that comments be provided in writing, along with any supporting documents or exhibits. Comments must be submitted to Doris A. McLeod, Air Quality Planner, Department of Environmental Quality, 629 E. Main St, PO Box 1105, Richmond, Virginia 23218 (phone 804-698-4197, fax 804-698-4510, email doris.mcleod@deq.virginia.gov). All materials received are part of the public record.

To review the proposal: The proposal and any supporting documents are available on the DEQ Air Public Notices for Plans web site (<http://www.deq.state.va.us/Programs/Air/PublicNotices/airplansandprograms.aspx>). The documents may also be obtained by contacting the DEQ representative named above. The public may review the documents between 8:30 am and 4:30 pm of each business day until the close of the public comment period at the following DEQ locations: 1) Main Street Office, 8th Floor, 629 E. Main St, Richmond, VA, 804-698-4070 and 2) Northern Regional Office, 13901 Crown Court, Woodbridge, VA, 703-583-3800.

SIP\NONATTN PLANS\2014\NVA-INV-SIP-notice

MDE Notice

NEW A public hearing regarding the “Base Year 2011 Emissions Inventory (Washington DC-MD-VA 2008 Ozone NAAQS Nonattainment Area)” will be held on Thursday, June 12, 2014 at the Montgomery County Planning Department, Regional Office at 8787 Georgia Avenue, Silver Spring, MD 20910 -- First Floor Media Room -- 10:00 A.M.

Copies of the document can be viewed at the links following this notice and at the offices of the Maryland Department of the Environment, Air and Radiation Management Administration, 1800 Washington Boulevard, Suite 730, Baltimore, Maryland. For more information, contact Molly Berger at (410) 537-3234.

Comments may be sent to Molly Berger, Maryland Department of the Environment, Air and Radiation Management Administration, 1800 Washington Boulevard, Suite 730, Baltimore, MD, 21230; emailed Molly.Berger@Maryland.gov.

For more information, contact Molly Berger at (410) 537-3234 (Toll free in Maryland call 1-(800) 633-6101 ext. 3234), or via email at Molly.Berger@Maryland.gov;

NEW Document Available for Public Comment: Base Year 2011 Emissions Inventory (Washington DC-MD-VA 2008 Ozone NAAQS Nonattainment Area)

- [Full Inventory Document without Appendices](#)
- [Appendices ZIP File](#). This file contains all the appendices in a 176 MB ZIP file.
 - A. Point Source Inventory Files
 - B1. Area and Nonroad (Marine Vessels, Airport, Railroad Locomotives) Source Inventory Development Document (Maryland)
 - B2. Area and Nonroad (Marine Vessels, Airport, Railroad Locomotives) Source Inventory Development Document (Virginia)
 - B3. Area and Nonroad (Marine Vessels, Airport, Railroad Locomotives) Source Inventory Development Document (District of Columbia)
 - B4. Area and Nonroad (Marine Vessels, Airport, Railroad Locomotives) Source Inventory Files
 - C. NMIM2008 (NONROAD Model) Input and Output Files
 - D1. Onroad Mobile Source Development Document
 - D2. MOVES 2010a (Onroad Mobile Model) Input and Output Files

Public Comments & Responses

Public Comments

No public comments were received by the District Department of the Environment and the Virginia Department of Environmental Quality on the base year 2011 emissions inventory document. Maryland Department of the Environment received a comment letter from US EPA dated June 12, 2014. EPA sent a revised version of this comment letter dated June 27, 2014. As required by 40 C.F.R. § 51.102(e), a complete record of these comments is located at the Air Division of the Maryland Department of the Environment. The department contact to access this information is:

Director, Air and Radiation Management Administration, Maryland Department of the Environment

As required by § 2.1(h) of Appendix V of 40 C.F.R. Part 51, below is a summary of the comments received and responses thereto. Included is a brief statement of the subject, the identification of the commenter, the summary of the comment and the response (analysis and action taken).

1. Subject: Use of IM240 program in Base Year 2011 onroad source emissions inventory development

Commenter: United States Environmental Protection Agency (EPA), Region III

Original Text (Comment letter dated June 12, 2014): With regards to the Onroad portion of the emissions inventory, specifically the vehicle inspection and maintenance coverage inputs for MOVES, Maryland cannot use the IM240 emissions test standards as part of the State's emissions inspection and maintenance (I/M) program. In August 2009, Maryland removed the IM240 test from the State's I/M program. This has been confirmed each year when the state submits to EPA a data analysis report for its I/M program as required by 40 CFR 51.366. As such, Maryland cannot rely on the additional emission benefits received from an emissions inspection test that is not currently implemented within the State.

Revised Text (Comment letter dated June 27, 2014): EPA withdrew its comments regarding using emissions benefits from the I/M240 program in the base year 2011 onroad mobile emission inventory. The text in the revised comment letter is as follows – “In August 2009, Maryland removed the IM240 test from the State's I/M program. This has been confirmed each year when the state submits to EPA a data analysis report for its I/M program as required by 40 CFR 51.366.”

Response: Maryland has worked with EPA to fix the technical comments identified in EPA's review of the SIP with relation to the IM240 program. MDE obtained a copy of the I/M input file that generated the EPA comment from Joseph Schulingkamp at EPA and compared it with the I/M input file that was part of the draft SIP submittal. MDE's comparison determined that the two files were inconsistent and the comment wasn't accurate. MDE discussed this inconsistency with Mr. Schulingkamp on June 20, 2014 during which he verbally agreed that the I/M input file from MDE was correct and that he considered the issue resolved. MDE sent an email confirming resolution of this MOVES

I/M input issue to Mr. Schulingkamp on July 1, 2014. Subsequently, EPA sent a revised comment letter dated June 27, 2014 conforming this.

2. Subject:

Commenter: United States Environmental Protection Agency (EPA), Region III

Text (Comment letters dated June 12, 2014 & June 27, 2014): As required by 40 CFR 51.104, whenever a program is substantially revised at the state level, the state should then revise its State Implementation Plan (SIP) to reflect those changes. In general, when SIP approved emission reduction programs are revised at the state level, the state must perform an anti-backsliding analysis as required by Clean Air Act (CAA) section 110(1) and submit that demonstration as part of the SIP revision to remove or amend the relevant SIP measure. This analysis should demonstrate that the revised emission control program will not negatively impact the state's ability of attaining or maintaining the relevant NAAQS. Also, EPA's I/M requirements rule adds an additional requirement specific to I/M programs, that the revised program meet the applicable I/M program performance standard test set out in 40 CFR 51, Subpart S (using the current emissions factor mobile source model, MOVES).

Upon submittal of an I/M SIP revision by Maryland, along with the accompanying performance standard analysis and noninterference demonstration, EPA would review the revision to ensure that the revised I/M program will continue to meet Federal requirements of both 40 CFR 51, Subpart S and the CAA.

Response: With respect to the comment regarding 40 CFR 51.104 and the revision of the IM SIP/ anti-backsliding analysis, MDE commits to working with EPA to resolve this comment/ submit any necessary SIP revisions or analysis before June 1, 2015.

Technical Corrections

1. Commenter: Virginia Department of Environmental Quality

Date received: April 23, 2014

Recipient: MWCOG

Comment: The VDEQ would like to request that the following revision be incorporated:

The Virginia Department of Environmental Quality would like submit revised 2011 commuter rail emission inventory estimates for northern Virginia for incorporation into the final 2011 emission inventory to be submitted to the EPA as part of the Base Year 2011 emissions inventory (Washington DC-MD-VA 2008 Ozone NAAQS Nonattainment Area submittal). The commuter rail emission estimates for northern Virginia jurisdictions that were included in the revision of the 2011 inventory that were sent out for public review were based on an ERTAC commuter rail study that was grown to CY 2011. Since that time, VDEQ has obtained actual CY 2011 commuter rail activity data and fuel consumption data from the VRE, along with equipment specific engine emission factors and has developed CY 2011 commuter rail emission estimates for northern Virginia which we feel more accurately represent the emissions associated with this source category.

SCC Code	FIPS Code	Pollutant Code	Annual Emissions (TPY)	Daily Emissions (TPD)
2285002009	51013	VOC	1.3186	0.0036
2285002009	51059	VOC	8.9597	0.0245
2285002009	51153	VOC	3.2008	0.0088
2285002009	51510	VOC	4.1131	0.0113
2285002009	51013	SO2	0.2256	0.0006
2285002009	51059	SO2	1.5329	0.0042
2285002009	51153	SO2	0.5476	0.0015
2285002009	51510	SO2	0.7037	0.0019
2285002009	51013	PM25-PRI	0.4246	0.0012
2285002009	51059	PM25-PRI	2.8854	0.0079
2285002009	51153	PM25-PRI	1.0308	0.0028
2285002009	51510	PM25-PRI	1.3246	0.0036
2285002009	51013	PM10-PRI	0.4379	0.0012
2285002009	51059	PM10-PRI	2.9756	0.0082
2285002009	51153	PM10-PRI	1.0630	0.0029
2285002009	51510	PM10-PRI	1.3660	0.0037
2285002009	51013	Nox	15.2126	0.0417
2285002009	51059	Nox	103.3689	0.2832
2285002009	51153	Nox	36.9282	0.1012
2285002009	51510	Nox	47.4536	0.1300
2285002009	51013	CO	6.5920	0.0181
2285002009	51059	CO	44.7926	0.1227
2285002009	51153	CO	16.0020	0.0438
2285002009	51510	CO	20.5630	0.0563

Response: MWAQC and the states agree. The changes will be reflected in the final document.

2. Commenter: Virginia Department of Environmental Quality

Date received: June 30, 2014

Recipient: MWCOG

The Virginia Department of Environmental Quality requested to submit a minor revision to the 2011 point source NOx emission inventory estimate for the Prince William county. This revision decreased the average ozone season day NOx emission for the county and the northern Virginia from 13.38 tons per day to 12.96 tons per day.

Response: MWAQC and the states agree. The changes will be reflected in the final document.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUN 12 2014

George Aburn, Director
Air & Radiation Management Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

Dear Mr. Aburn:

Thank you for giving the U.S. Environmental Protection Agency (EPA) the opportunity to review the proposed 2011 Base Year Emissions Inventory for the Washington, DC-MD-VA nonattainment area for the 2008 ozone national ambient air quality standards (NAAQS). EPA has reviewed the proposed base year inventory and our comments are enclosed.

Please enter these comments into the public record. We look forward to working with you to resolve these comments. Should you have any questions pertaining to EPA's review, please do not hesitate to contact me. If members of your staff have questions, they may direct them to Mr. Brian Rehn, Office of Air Program Planning, at (215) 814-2176.

Sincerely,

A handwritten signature in blue ink, appearing to read "Diana Esher".

Diana Esher, Director
Air Protection Division

Enclosures

cc: Molly Berger, Maryland Department of the Environment



EPA Comments on Maryland's Proposed 2011 Base Year Emissions Inventory for the Washington, DC-MD-VA 2008 Ozone NAAQS Nonattainment Area

With regards to the Onroad portion of the emissions inventory, specifically the vehicle inspection and maintenance coverage inputs for MOVES, Maryland cannot use the IM240 emissions test standards as part of the State's emissions inspection and maintenance (I/M) program. In August 2009, Maryland removed the IM240 test from the State's I/M program. This has been confirmed each year when the state submits to EPA a data analysis report for its I/M program as required by 40 CFR 51.366. As such, Maryland cannot rely on the additional emission benefits received from an emissions inspection test that is not currently implemented within the State.

Additionally, as required by 40 CFR 51.104, whenever a program is substantially revised at the state level, the state should then revise its State Implementation Plan (SIP) to reflect those changes. In general, when SIP approved emission reduction programs are revised at the state level, the state must perform an anti-backsliding analysis as required by Clean Air Act (CAA) section 110(l) and submit that demonstration as part of the SIP revision to remove or amend the relevant SIP measure. This analysis should demonstrate that the revised emission control program will not negatively impact the state's ability of attaining or maintaining the relevant NAAQS. Also, EPA's I/M requirements rule adds an additional requirement specific to I/M programs, that the revised program meet the applicable I/M program performance standard test set out in 40 CFR 51, Subpart S (using the current emissions factor mobile source model, MOVES).

Upon submittal of an I/M SIP revision by Maryland, along with the accompanying performance standard analysis and noninterference demonstration, EPA would review the revision to ensure that the revised I/M program will continue to meet Federal requirements of both 40 CFR 51, Subpart S and the CAA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

George Aburn, Director
Air & Radiation Management Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

JUN 27 2014

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JUL 08 2014

DIRECTOR'S OFFICE

Dear Mr. Aburn:

On June 12, 2014, EPA submitted public comments regarding the proposed 2011 Base Year Emissions Inventory for the Washington, DC-MD-VA nonattainment area for the 2008 ozone national ambient air quality standards (NAAQS). In that letter EPA commented, "...Maryland cannot rely on the additional emission benefits received from an emissions inspection test [the IM240 test] that is not currently implemented within the State." After discussions with the Maryland Department of the Environment, EPA has concluded that the Onroad portion of the emissions inventory does not rely on emission benefits from the IM240 test.

Therefore, EPA's comments regarding the Onroad portion of the emissions inventory have been resolved; however, the remaining comments regarding changes to any approved program that is part of the State Implementation Plan (SIP) and the requirement to update the SIP and perform applicable analyses still stand. Please enter these revised comments into the public record. We look forward to working with you to resolve these comments. Should you have any questions pertaining to EPA's review, please do not hesitate to contact me. If members of your staff have questions, they may direct them to Mr. Brian Rehn, Office of Air Program Planning, at (215) 814-2176.

Sincerely,

A handwritten signature in blue ink that reads "Diana Esher".

Diana Esher, Director
Air Protection Division

Enclosures

cc: Molly Berger, Maryland Department of the Environment



EPA Comments on Maryland's Proposed 2011 Base Year Emissions Inventory for the Washington, DC-MD-VA 2008 Ozone NAAQS Nonattainment Area

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