

**MEMORANDUM**

**Item 6**

**TO:** MWAQC TAC

**FROM:** Joan Rohlf, COG/DEP  
Jeff King, COG/DEP

**DATE:** October 8, 2004

**SUBJECT:** Development of Control Measures for the 8-Hour Ozone Standard

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As the Washington, DC-MD-VA region is a designated nonattainment area for the 8-hour ozone standard, EPA is expected to announce that the Region will be required to prepare a Rate of Progress or Reasonable Further Progress ((RFP) SIPs. Preliminary sketch analysis suggests that control measures will be needed for the region to demonstrate a 15 percent Reasonable Further Progress. The following proposes a process and a choice of two schedules for the process. Also attached are lists of control measures, and possible criteria for evaluating proposed new measures. We recommend that a process begin now to review control measures, before the RFP targets are calculated, because of the time involved in selecting measures, obtaining funding, and adopting regulations.

**Schedule**

A Reasonable Further Progress SIP is likely to be required by December 2006. If a tighter schedule is adopted, it may be possible to complete a RFP in the spring of 2006, with the states submitting the SIP in August 2006. The draft schedule has two schedules, a 2006 Early schedule with August submittal, and a 2006 schedule with December submittal.

**Tasks**

We propose to begin the process by identifying a Workgroup to review potential measures, adding and deleting measures, and agreeing on selection criteria. The process of defining the selection criteria and requesting ideas from individuals and groups outside of MWAQC will take an estimated 7-8 months. During this time, staff will refine the sketch analysis and will evaluate candidate measures.

From now until December, the Inventory Subcommittee will update the 2002 base year emissions inventories. Once the base year inventory is sufficiently improved, staff will begin preparing a 2008 Reasonable Further Progress inventory. This task is expected to take a minimum of six months. The RFP targets can be calculated when the 2002 baseline and the 2008 projected inventories are complete. The RFP targets may be available in May 2005, if the baseline and projection inventories are completed in the suggested time period.

### **Lists of Control Measures**

Two lists available for review are the complete list of control measures developed for MWAQC review in 2003 and the Gold Book List of Measures. These lists are provided as Attachments.

### **Criteria for Evaluating New Measures**

Also attached is the Reasonably Available Control Measure (RACM) screening methodology used for the "Severe Area SIP". The following criteria, based on the RACM analysis, are available to assist in screening and evaluating the new measures for the 8-hour ozone standard.

- Measures should be implemented after December 31, 2002 and before December 31, 2008.
- Measures should be enforceable.
- Measures should be technically feasible.
- Measures should not cause substantial or widespread adverse impacts.
- Measures should be cost effective and should not require an intensive and costly implementation effort.
- Measures should collectively achieve or exceed the reduction requirement (including offsetting emissions expected from growth).
- Measures that can provide ancillary benefits, including reductions in emissions of PM2.5 precursors, should be considered.

### **Next Steps**

The Working Group should agree on a regular monthly conference call to begin discussion of the proposed criteria and the attached lists. The first call will be scheduled in November. EPA is expected to issue the second phase of the 8-hour ozone standard implementation guidance by the end of the year. The proposed schedule may be revised, depending on EPA's expected guidance.

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<b>8-Hour SIP Planning: Reasonable Further Progress SIP Proposed Schedule</b>		
<b>Task</b>	<b>Responsible Party</b>	<b>Deadline</b>
<b>Control Measure Development</b>		
Criteria for RFP measures	Staff	October 2004
Identify Workgroup	TAC	
Identify measures		Sept-May 2005
Update 1-hr SIP List	TAC, Staff, AQPAC	
Review Gold Book Measures	TAC, Staff, AQPAC	
Monthly Workgroup Calls	States, TAC, Staff	
Select Measures		May 2005
Funding commitments	States/Locals	
Draft regulations	States	
Introduce regulations	States	Sept. 2005
<b>Inventory Development</b>		
Inventory Update: 2002 Base Year	States/Staff	Sept-Nov 2004
Prepare 2008 RFP Inventories	States/Staff	Sept-April 2005
Calculate RFP Targets	States/Staff	May 2005
<b>SIP Submittal - 2006 Early</b>		
Draft SIP to TAC	Staff	Feb 2006
Draft SIP to MWAQC	Staff	March 2006
Public Comment, Hearings	States/Staff	April-May 2006
Response to Public Comment	States/Staff	June 2006
MWAQC approval	MWAQC	July 2006
SIP to States, EPA	States	August 2006
<b>SIP Submittal - 2006</b>		
Draft SIP to TAC	Staff	May/June 2006
Draft SIP to MWAQC	Staff	June/July 2006
Public Comment, Hearings	States/Staff	Aug-Sept 2006
Response to Public Comment	States/Staff	October 2006
MWAQC approval	MWAQC	November 2006
SIP to States, EPA	States	December 2006

Deadline: 12/31/06