

Memorandum

February 13, 2007

TO: MWAQC Technical Advisory Committee
 FROM: Jeff King, COG/DEP
 Subject: Contingency Measures for the 8-hour Ozone SIP

This memorandum presents updated information on possible approaches to meeting Contingency Plan Requirements for the 8-hour ozone SIP for the Washington, DC region. Reductions from contingency measures must be above and beyond the reductions applied to demonstrate RFP and attainment, and reductions must be available no later than the year following identification of the failure.

Contingency Requirement

Contingency Requirement: Possible VOC/NOx Combinations for RFP and Attainment Contingency

	VOC (tpd)	NOx (tpd)	VOC %	NOx %	Total %	VOC (tpd)	NOx (tpd)
Adjusted 2002 Base Year							
Inventory	442.63	565.56	0.3%	2.7%	3.0%	1.3	15.3
Total contingency reduction must equal 3%.			0.5%	2.5%	3.0%	2.2	14.1
Minimum VOC required is 0.3%.			1.0%	2.0%	3.0%	4.4	11.3
RFP Contingency implemented in 2010			1.5%	1.5%	3.0%	6.6	8.5
Attainment Contingency implemented in 2010 or 2011			2.0%	1.0%	3.0%	8.9	5.7
			2.5%	0.5%	3.0%	11.1	2.8
			3.0%	0.0%	3.0%	13.3	0.0

Contingency Options

There are three potential categories of measures which provide reductions that could be used to meet contingency requirements: the OTC Portable Fuel Container Rule; various nonroad sector rules; and mobile sector controls such as Tier 2 vehicle emission standards. The table below provides an estimate of the reductions available from the PFC and nonroad measures, showing the shortfall that could be met by reductions from the mobile sector.

Various Scenarios for Meeting Attainment Contingency						
DRAFT, for discussion only.						
Numbers subject to change.						
	2010 1			2011 2		
	w/PFC, nonroad only			w/PFC and nonroad only		
	2009-2010 Reductions (tpd)			2009-2011 Reductions (tpd)		
	VOC	NOx	VOC+NOx	VOC	NOx	VOC+NOx
Area Source (Portable Fuel Containers)	2.33	0.00		4.62	0.00	
Nonroad Sector Reductions	2.48	1.86		3.84	4.28	
TOTAL	4.81	1.86		8.46	4.28	
Total Percent Reduction	1.10%	0.33%	1.43%	1.93%	0.76%	2.69%
Total Percent Shortfall		or	1.57%		or	0.31%
Tonnage Shortfall (VOC or NOx)	6.90	8.90		1.37	1.77	

Note: Area source reductions do not include the District.