

# PLANNING ACTIVITIES FOR 2015 OZONE NAAQS IN WASHINGTON REGION

---

Sunil Kumar  
Principal Environmental Engineer

MWAQC  
May 25, 2022

Item 5a



# Attainment Status – 2015 Ozone NAAQS

---

- Initially designated Marginal Nonattainment Area (NAA) for 2015 Ozone NAAQS.
- Failed to attain by deadline for Marginal NAA (August 2021) based on 2018-20 Design Value (71 parts per billion).
- EPA recently proposed bump up to Moderate NAA.
- Moderate NAA SIP due January 1, 2023.
- Deadline to attain is August 3, 2024 (based on 2021-23 Design Value).
- Certified 2021 data shows attainment (70 ppb). EPA intends to issue Clean Data Determination after the end of ozone season (Fall 2022).

# Current Planning Activities

---

- Washington region is working on both Attainment Plan and Redesignation Request & Maintenance Plan (RR/MP).
- Attainment Plan is expected to be submitted in June 2023 (Deadline Jan 1, 2023). This delay in plan submittal may result in EPA issuing a “Finding of Failure to Submit” starting an 18-month SIP submittal requirement. However, June 2023 submittal would stop this clock, so delay is not expected to affect anything adversely for the region.

# Attainment/Maintenance Plan Schedule

2015 Ozone SIP Planning (Attainment SIP vs Maintenance Plan/Redesignation Request)

Revised 2/8/2022

Tasks	2021												2022												2023																																
	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec																								
1 Inventories																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									
2 Motor Vehicle Emissions Budgets																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									
3 Control Measures																																																									
Attainment SIP (Contingency, RACM, Voluntary)																																																									
Maintenance Plan/Redesignation Request (Contingency)																																																									
4 Weight of Evidence Analysis																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									
5 Photochemical Modelling																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									
6 Draft Documents & EPA Review																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									
7 MWAQC Approval & Public Comment Period																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									
8 States Submit to EPA																																																									
Attainment SIP																																																									
Maintenance Plan/Redesignation Request																																																									

- Required for Attainment SIP
- Required for Maintenance Plan/Redesignation Request
- Not required
- Additional Time to Accommodate MDE's Baltimore/Philly SIP Schedule

EPA Submittal Deadline - January 1, 2023  
 MVEBs (Approved/Deemed adequate) needed by Fall 2023

# Current Planning Activities

---

- Planning After 2022 Ozone Season
  - If 2022 ozone season puts the region back into nonattainment, EPA would not issue a CDD and the region would be required to submit an Attainment Plan.
  - If 2022 ozone season keeps the region in attainment, EPA would likely issue a CDD and the region would have the option to submit a request to redesignate it to attainment (A maintenance plan will also be required to be submitted).
  - Maintenance Plan submittal has no time limits, but TPB needs an approved Motor Vehicle Emissions Budgets (MVEBs) based on the latest available onroad emissions model sometime by the end of 2023.

# Current Planning Activities

---

- TPB currently uses MVEBs based on an old model (from 2008 ozone Maintenance Plan) and the latest EPA approved model (MOVES3) produces higher NOx emission estimates in comparison. This may pose difficulty in demonstrating conformity.
- Region will work with EPA to get new MVEBs (either from Attainment or Maintenance Plan) approved by the end of 2023 for use in the future conformity analyses.
- Staff will be monitoring 2022 ozone season and tracking EPA's action this year on bump-up proposal and CDD.
- Region is working on developing control/contingency measures, that could be used in both Attainment or Maintenance Plan. Two special MWAQC-TAC sessions were held in April and May to discuss a few such measures.