

Metropolitan Washington Air Quality Committee

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November 14, 2007

Honorable Catherine Hudgins, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE
Washington, D.C. 20002

Dear Chair Hudgins:

The Metropolitan Washington Air Quality Committee (MWAQC) is finalizing a State Implementation Plan (SIP) due to EPA by April 2008. The SIP is a plan to meet the Clean Air Act requirements for attaining EPA's annual PM_{2.5} National Ambient Air Quality Standard. A contingency plan is a SIP requirement and one that the Washington region requests assistance from the transportation sector.

The SIP contingency plan will take effect in the event the region fails to meet the annual PM_{2.5} standard by December 2009.¹ EPA would notify the states in 2010 of the region's failure to meet the standard and the region would be required, without further action by the States or EPA, to implement reduction measures providing approximately 10,000 tons per year NOx reductions by 2011. In the recently-submitted 8-hour ozone SIP, TPB concurred with MWAQC's proposal to use a small portion of mobile NOx reductions (1.8 tpd) occurring in 2010 to meet the 8-hour ozone SIP contingency requirement.

MWAQC requests that TPB support the same NOx reductions used for contingency in the 8-hour SIP to be used for the PM_{2.5} SIP, although the NOx reductions would be annual not ozone season reductions. Staff estimates that 1.8 tons per day NOx reductions in the ozone season equates to 657 tons per year. These mobile NOx reductions are benefits from currently adopted federal vehicle and fuel technology control standards.

The PM_{2.5} contingency plan requires much more NOx reduction than 657 tons per year, however, EPA will allow the region to substitute sulfur dioxide reductions from the Clean Air Interstate Rule and the Healthy Air Act to meet the additional contingency reduction requirement.

In mid-December the draft SIP will go to MWAQC to be approved for public hearings. The draft SIP will be establishing new mobile source emissions budgets for PM_{2.5} direct and the precursor NOx for 2009, the attainment year.

¹ The region's monitors showed compliance with the annual PM_{2.5} standard in 2005 and 2006. The region is expected to continue to show compliance in 2009.

The SIP process for establishing mobile NOx credits for contingency would be to set new mobile emissions budgets for 2010. The new mobile emissions budgets would be the 2009 mobile budgets less the amount of NOx reductions set aside for contingency. The additional NOx reductions will be needed only if the region does not attain the PM_{2.5} standard by December 2009. Staff estimates that 7,500 tons per year of mobile NOx reductions will be generated between 2009 and 2010 in the Washington region. As part of these reductions up to 657 tons per year of NOx could be credited towards the total amount of contingency reductions in the SIP. The reductions would be in a new 2010 mobile budget, which would be 2009 NOx mobile budget less the amount of NOx reductions set aside for contingency.

On behalf of MWAQC, I ask your support for this proposal and ask you to authorize COG's Department of Transportation Planning staff to work with MWAQC staff to finalize the contingency plan element of the annual PM_{2.5} SIP including new 2010 mobile source emissions budgets. Timing is of the essence in order to complete the SIP by the deadline. Please respond no later than December 10, 2007, so that MWAQC can finalize the draft SIP at its December 12, 2007 meeting.

As always, we appreciate your contributions to improving the air quality in the Metropolitan Washington region.

Sincerely,

A handwritten signature in black ink that reads "Nancy Floreen". The signature is written in a cursive, flowing style.

Nancy Floreen, Chair
Metropolitan Washington Air Quality Committee