MEMORANDUM

To: Members, Metropolitan Washington Air Quality Committee (MWAQC)

From: Joan Rohlfs, Chief, Air Quality Planning

Date: September 16, 2004

Subject: 8-Hour SIP Planning: Status Report

Background

In April EPA designated the Washington, DC-MD-VA region as in moderate nonattainment for the 8-hour ozone standard. The rule set 2010 as the target for attainment, and states are required to submit state implementation plans in 2007. The guidance was the first of a two-phase process. The second phase of the guidance describing the requirements for attainment modeling was expected this month but may be delayed until November. In the second phase of the guidance EPA is expected to require Reasonable Further Progress for moderate areas, with the milestone date being December 31, 2008. The Reasonable Further Progress SIP could be due in June 2006.

Transportation Conformity

In July EPA released its 8-hour ozone transportation conformity guidance, outlining options for areas like the Washington, DC-MD-VA nonattainment area that have existing mobile budgets for the one-hour ozone standard. The region is required to conduct an 8-hour conformity determination by June 15, 2005 or face a conformity lapse.

The guidance provides two options for conducting conformity guidance before 8-hour mobile emissions budgets are established. The Washington, DC-MD-VA nonattainment area for the 8-hour ozone standard is smaller than the area for the one-hour standard because Stafford County, Virginia is no longer included. The two options for transitional mobile emissions budgets are to 1) revise the existing one-hour mobile budgets, removing Stafford County emissions from the budgets and the mobile emissions estimates; or 2) use the existing one-hour mobile emissions budgets, keeping Stafford County in the budgets and in the mobile emissions estimates. The Transportation Planning Board proposes to include Stafford County in the transitional 8-hour conformity analysis and will be requesting MWAQC's comments on the proposal.

COG's Department of Transportation Planning is preparing to add 2010 as a new milestone year for the 8-hour conformity analysis and plans to conduct an 8-hour conformity determination in January 2005.

Status of Attainment Modeling

There have been two calls to coordinate 8-hour attainment modeling for the Washington, DC-MD-VA nonattainment area. The Virginia Dept. of Environmental Quality is taking the lead for the modeling. The target completion date is September-October 2006. The results will be submitted as part of the region's attainment state implementation plan in 2007.

The states expect the 2002 base year emissions inventory to be ready by the end of this year. The Ozone Transport Commission's Modeling Committee is evaluating the suitability of 2002 ozone episodes for modeling 8-hour attainment. As stated earlier, EPA's guidance on these issues is expected later this year.

Next Steps: Control Measures

The Technical Advisory Committee will begin reviewing measures in October to determine those offering potential. In August EPA provided guidance opening the door to including energy efficiency and renewable energy measures for SIP credit. States having a NOx set-aside program may take credit for voluntary energy efficiency and renewable energy programs if allowances are retired. Staff is re-evaluating last year's list of control measures and Gold Book measures for use in the 8-hour attainment plan.