

# INVENTORIES & MILESTONE YEARS - 2015 OZONE NAAQS SIP

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June 14, 2022

# Background

- The Washington region did not attain the 2015 ozone NAAQS by the deadline (August 3, 2021) so EPA recently proposed bumping up the region. If this rule is finalized, the region will need to submit an attainment plan.
- Based on 2019-2021 data (70 ppb), the region attained the above NAAQS. However, EPA indicated that it would like to wait until Fall 2022 to evaluate the 2022 data and see if the region is able to maintain its compliance with the above NAAQS again this year before it issues a Clean Data Determination (CDD). CDD will suspend the requirement for the region to submit the attainment plan.
- Though there is no required deadline for submitting a maintenance plan, the region needs to have approved (or deemed adequate) set of MVEBs by 2023 so the next conformity analysis could use MVEBs updated with new MOVES3 model. This model version is expected to yield higher NOx emissions estimates compared to those estimated by MOVES2014, which was used to develop current MVEBs for the 2008 Ozone Maintenance SIP.
- Considering above circumstances, the region is currently working on both attainment and maintenance plans for the 2015 ozone NAAQS.

# Milestone Years & Inventories - Attainment Plan

- **Milestone Years**
  - Base Year – 2017
  - Attainment Year – 2023
- **Emissions Inventories**
  - Base Year 2017 Inventory
    - Washington region submitted BY2017 inventory in 2020.
    - States can send any updates to the BY2017 inventory.
    - Nonroad and onroad inventories will be updated using MOVES3.0.3 model.  
(Request for mode inputs were sent in early June 2022)
  - Attainment Year 2023 Inventory
    - States will be providing point source inventories
    - Nonroad and onroad inventories will be developed using MOVES3.0.3 model.  
(Request for mode inputs were sent in early June 2022)
    - Non-point and marine, air, and rail (MAR) inventories for 2023 will be developed by projecting BY2017 inventories using appropriate growth surrogates and factors.



# Milestone Years - Maintenance Plan

- Need to coordinate with TPB to align with conformity milestone years and with EPA to get confirmation on those years
  - Candidate Milestone Years
    - Baseline year – 2017
    - Attainment years – 2019/2020/2021 (Can be one of the three attainment design value years)
    - Intermediate years (Needs to be in the middle of attainment and future years)
      - 2026 (EPA ozone transport modeling year)
      - 2027 & 2028
    - Future years
      - 2032 (EPA ozone transport modeling year)
      - 2035 (Seems appropriate for 2023 submittal, meets 12 years criterion)

