

Questions for EPA re. Base Year Emissions Inventory Submittal Requirements

(2015 Ozone NAAQS)

EPA designated the Washington region on August 3, 2018 as a marginal nonattainment area for the 2015 ozone NAAQS. The final implementation rule published on December 6, 2018 for the 2015 ozone NAAQS requires the submission of a comprehensive base year emissions inventories for point, non-point (area), on-road, and nonroad sources. We have the following questions concerning the base year emissions inventory requirements.

1. Milestone year for base year – The final implementation rule provides two options for selecting the milestone year for the base year. First option is the most recent calendar year for which a complete triennial inventory is required to be submitted to EPA. The second option is the calendar year of the nonattainment designation. The Washington region was designated as a nonattainment area in 2018.  
For the Washington DC-MD-VA nonattainment region, the year 2017 seems a more appropriate option. The District, Maryland, and Virginia are currently working with EPA to submit emissions inventories for the year 2017 as part of the National Emissions Inventory (NEI) effort. The final NEI 2017 data and information is expected to be published by EPA by September 15, 2019 for point, on-road/nonroad, and event sources and by February 28, 2020 for non-point sources. The region plans to use these inventories for the base year submittal. However, if the above schedule is delayed for any reason, then the region will use the draft data available by these dates. Regarding the year 2018, no prior data and information exists, and it will take significant time to develop them. Therefore, the Washington DC-MD-VA nonattainment region wishes to opt for 2017 as the milestone year for the base year. Do you agree with our selection of the base year option?
2. Time period of emissions data & pollutants - The final implementation rule requires the base year emissions inventory to be submitted for an average ozone season day for VOC and NOx. Since annual emissions are used for developing ozone season day emissions for a few source categories (e.g., a few point and area sources), we understand that those annual emissions would also need to be included in the inventory. Though CO emissions are not required as part of the base year emissions inventory submittal, we would like to include them for use at a later date when the Washington DC-MD-VA nonattainment region opts to submit a redesignation request and a maintenance plan for the 2015 ozone NAAQS. In a nutshell, the region plans to submit ozone season day emissions inventories for VOC, NOx, and CO along with annual emissions for these pollutants for those sources where annual emissions are used to develop ozone season day emissions. Please let us know if the above time period of emissions and the list of pollutants suffices the base year emissions inventory requirements.
3. Vehicle Registration Data (VIN) - The VIN data is one of the inputs for the on-road emissions model. The District, Maryland, and Virginia are planning to submit the 2017

VIN data for the on-road model inputs for the NEI 2017 submittal. While Maryland and Virginia plan to use the actual 2017 VIN data [as of 12/31/2017], the District plans to project the 2016 VIN data to 2017 [as of 01/01/2018]. The National Capital Region Transportation Planning Board (TPB) recently developed the 2016 VIN data for the region's transportation conformity analysis. Since it takes significant time and resources to process the raw VIN data and develop it in the on-road model ready format, would it be possible to use the already developed 2016 VIN data to meet the deadline for the base year emissions inventory submittal? Also, if the 2016 VIN data is used for the 2017 emissions inventory, would EPA require that the base year inventory for on-road emissions be recalculated and resubmitted using 2017 VIN data in the future when the region develops a redesignation request/maintenance plan or an attainment SIP (if the region is redesignated as a moderate nonattainment area)?

4. Due to the complexities of developing the inputs for the 2017 NEI and the potential for EPA to move back various dates for 2017 NEI data availability, VDEQ, MDE, DCDOEE, and MWAQC staff do not expect to have a draft BY inventory ready for preliminary review by EPA until January or February 2020. Is this timeframe acceptable to EPA? Also, how long does EPA expect would be needed for the preliminary review? The state agencies and MWAQC staff request that any comments EPA develops during the preliminary review be supplied in writing (email is acceptable) to facilitate response and edits.
5. Other pertinent information and requirements – Please let us know about any other information or requirements that are not mentioned above.

**Commented [SK1]:** Added as of date to 2017 VIN data to address VDEQ's suggestion below.

**Commented [SK2]:** Added as of date to 2017 VIN data to address VDEQ's suggestion below.

**Commented [MD(3)]:** When referencing the VIN data, referencing the month along with the year it was developed would be helpful. For example, when we say 2017 VIN data, is that as of 1/1/2017 or 12/31/2016? Reference the "as of" date would also help when considering DC's proposal to use adjusted 2016 data.