

Memorandum

February 28, 2007

TO: Metropolitan Washington Air Quality Committee

FROM: MWAQC Technical Advisory Committee

Subject: Contingency Plan for the 8-hour Ozone SIP

This memorandum presents the proposed approach to meeting contingency plan requirements for the 8-hour ozone SIP for the Washington, DC region. Reductions from contingency measures must be above and beyond the reductions applied to demonstrate Reasonable Further Progress (RFP) and attainment, and reductions must be available no later than the year following EPA notification of any failure to meet RFP or attainment.

Contingency Requirement

The contingency plan must provide for a 3 percent reduction in emissions compared to the Adjusted 2002 Base Year Inventory. The table below provides examples of possible combinations of VOC and NOx reductions that could satisfy the requirements.

Contingency Requirement: Possible VOC/NOx Combinations for RFP and Attainment Contingency

	VOC (tpd)	NOx (tpd)	VOC %	NOx %	Total %	VOC (tpd)	NOx (tpd)
Adjusted 2002 Base Year Inventory	442.63	565.56	0.3%	2.7%	3.0%	1.3	15.3
Total contingency reduction must equal 3%.			0.5%	2.5%	3.0%	2.2	14.1
Minimum VOC required is 0.3%.			1.0%	2.0%	3.0%	4.4	11.3
RFP Contingency implemented in 2010			1.5%	1.5%	3.0%	6.6	8.5
Attainment Contingency implemented in 2010 or 2011			2.0%	1.0%	3.0%	8.9	5.7
			2.5%	0.5%	3.0%	11.1	2.8
			3.0%	0.0%	3.0%	13.3	0.0

Contingency Plan

The contingency plan must include reductions for failures of either Reasonable Further Progress (RFP) or attainment. Early implementation of contingency measures is acceptable. The recommended strategy for meeting these requirements is outlined below.

For Reasonable Further Progress: The recommended contingency plan for potential RFP failures is to include in the SIP an RFP plan that demonstrates an 18 percent reduction in emissions by 2008. This is 3 percent above the required 15 percent reduction. The additional 3 percent reduction above the requirement can be attributed to Tier 2 vehicle emission standards. The Emission Inventory Subcommittee has confirmed that the region can demonstrate 18 percent reduction by 2008, one year before the required contingency credits would need to be in place. EPA has provided written confirmation that this approach is acceptable.

For Attainment: There are three categories of measures which provide reductions that can be used to meet attainment contingency requirements: the OTC Portable Fuel Container

Rule; various nonroad sector rules; and mobile sector controls such as Tier 2 vehicle emission standards. The table below provides an estimate of the reductions available from these sources, showing that the reductions achieved equal the required 3 percent of the adjusted base year inventory, and are available by the required deadline of 2011. The mobile source reductions will be achieved before 2011 and will be substantiated by establishment of a 2010 mobile budget; TPB approved such an approach at its February 21, 2007 meeting.

Attainment Contingency Plan Reductions				
DRAFT		26-Feb-07		
2011 Scenario		Contingency Plan Reductions (tpd)		
Reduction Source	Timeframe of Reduction	VOC	NOx	VOC+NOx
Area Source Reductions (Portable Fuel Containers)	2009-2011	4.62	0.00	
Nonroad Sector Reductions	2009-2011	3.84	4.28	
On-road Sector Reductions	2009-2010		1.77	
TOTAL		8.46	6.05	
Total Percent Reduction		1.93%	1.07%	3.00%
Total Percent Shortfall		or		0.00%
Tonnage Shortfall (VOC or NOx)		0.00	0.00	

Note: Area source reductions do not include the District.