

MEMORANDUM

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

FROM: Joan Rohlfs, Chief, Air Quality Planning

DATE: October 20, 2004

SUBJECT: Development of Control Measures for the 8-Hour Ozone Standard

As the Washington, DC-MD-VA region is a designated nonattainment area for the 8-hour ozone standard, EPA is expected to announce that the Region will be required to prepare a Rate of Progress or Reasonable Further Progress (RFP) SIPs. Preliminary sketch analysis suggests that control measures will be needed for the region to demonstrate a 15 percent Reasonable Further Progress. The following proposes a process and a choice of two schedules for the process. Also attached are lists of control measures, and possible criteria for evaluating proposed new measures. We recommend that a process begin now to review control measures, before the RFP targets are calculated, because of the time involved in selecting measures, obtaining funding, and adopting regulations.

Schedule

A Reasonable Further Progress SIP is likely to be required by December 2006. If a tighter schedule is adopted, it may be possible to complete a RFP in the spring of 2006, with the states submitting the SIP in August 2006. The draft schedule has two schedules, an 2006 Early schedule with August submittal, and a 2006 schedule with December submittal.

Tasks

The Technical Advisory Committee (TAC) has formed a Workgroup to review potential measures, adding and deleting measures, and agreeing on selection criteria. The process of defining the selection criteria and requesting ideas from individuals and groups outside of MWAQC will take an estimated 7-8 months. During this time, staff will refine the sketch analysis and will evaluate candidate measures.

From now until December, the Inventory Subcommittee will update the 2002 base year emissions inventories. Once the base year inventory is sufficiently improved, staff will begin preparing a 2008 Reasonable Further Progress inventory. This task is expected to take a minimum of six months. The RFP targets can be calculated when the 2002 baseline and the 2008 projected inventories are complete. The RFP targets may be available in May 2005, if the baseline and projection inventories are completed in the suggested time period.

Lists of Control Measures

Two lists available for review are the complete list of control measures developed for MWAQC review in 2003 and the Gold Book List of Measures. These lists are provided as Attachments 2 and 3.

Criteria for Evaluating New Measures

Attachment 4 provides the Reasonably Available Control Measure (RACM) screening methodology used for the "Severe Area SIP". The following criteria, based on the RACM analysis, are available to assist in screening and evaluating the new measures for the 8-hour ozone standard.

- Measures should be implemented after December 31, 2002 and before December 31, 2008.
- Measures should be enforceable.
- Measures should be technically feasible.
- Measures should not cause substantial or widespread adverse impacts.
- Measures should be cost effective and should not require an intensive and costly implementation effort.
- Measures should collectively achieve or exceed the reduction requirement (including offsetting emissions expected from growth).
- Measures that can provide ancillary benefits, including reductions in emissions of PM_{2.5} precursors, should be considered.

Next Steps

The Working Group will hold a monthly conference call to discuss proposed criteria and the attached lists. The first call was held October 26. EPA is expected to issue the second phase of the 8-hour ozone standard implementation guidance by the end of the year. The proposed schedule may be revised, depending on EPA's expected guidance.

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8-Hour SIP Planning: Reasonable Further Progress SIP		
Proposed Schedule		
Task	Responsible Party	Deadline
Control Measure Development		
Criteria for RFP measures Identify Workgroup	Staff	October 2004
Identify measures Update 1-hr SIP List	TAC, AQPAC MWAQC	Sept-May 2005
Review Gold Book Measures Monthly Workgroup Calls	States, TAC	
Select Measures		May 2005
Funding commitments	States/locals	
Draft regulations	States	
Introduce regulations	States	Sept. 2005
Inventory Development		
Inventory Update: 2002 Base Year	States/Staff	Sept-Nov '04
Prepare 2008 RFP Inventories	States/Staff	Sept-April
Calculate RFP Targets	COG Staff	May 2005
SIP Submittal- 2006 Early		
Draft SIP to TAC		Feb 2006
Draft SIP to MWAQC	Staff	March 2006
Public Comment, Hearings		April-May '06
Response to Public Comment		June 2006
MWAQC approval		July 2006
SIP to States, EPA		August
SIP Submittal - 2006		
Draft SIP to TAC	Staff	May/June '06
Draft SIP to MWAQC	Staff	June/July '06
Public Comment, Hearings		Aug-Sept '06
Response to Public Comment		October 2006
MWAQC approval		November '06
SIP to States, EPA		December '06

Deadline: 12/31/06