UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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FEB 12 2003

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Clarification of Policy Guidance for MOBILE6 SIPs in Mid-course Review Areas

FROM: Tom Helms, OAQPS Tom Helms by LHC
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TO: EPA Regional Air Division Directors

EPA was recently asked to clarify its response to Question 5 of its MOBILE6 policy guidance in ozone nonattainment areas that will be completing mid-course reviews in the future.[1] These areas are revising the motor vehicle emissions inventories in their attainment SIPs with the MOBILE6 emissions factor model. This memorandum is intended to clarify the approach for determining that revised attainment SIPs in these areas continue to demonstrate attainment with revised MOBILE6 inventories.[2] The approach we envision and recommend for the analysis is as follows.

- Review growth and control strategy assumptions for non-motor vehicle sources (i.e., point, area, and non-road mobile sources). Verify that the assumptions continue to be valid and minor updates do not change the overall conclusions of the SIP. If the assumptions are no longer valid, update the non-motor vehicle inventories that have changed.

- SIPs that relied on absolute modeling:

  - If the non-motor vehicle inventories have not changed, compare the new MOBILE6-based on-road motor vehicle inventory for the attainment year to the old MOBILE5-based inventory for the attainment year.

  - If the non-motor vehicle inventories are updated to reflect new assumptions, compare the new total SIP inventory for the attainment year (incorporating the new MOBILE6-based motor vehicle inventory) to the old total SIP inventory

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[1]EPA issued its "Policy Guidance on the Use of MOBILE6 for SIP Development and Transportation Conformity" on January 18, 2002.

[2]See the "Attainment or maintenance demonstration" section of Question 5 on page 9 of the guidance.

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(incorporating the old MOBILE5-based motor vehicle inventory).

- In either case, if the new on-road motor vehicle or total SIP inventory is equal to or lower than the old one, a shortfall is not indicated and the SIP continues to demonstrate attainment. Otherwise, the shortfall is the difference between the attainment year (new on-road motor vehicle or total SIP) inventory based on MOBILE6 and the corresponding old attainment year inventory based on MOBILE5.

- SIPs that relied on relative modeling:

  - If the non-motor vehicle inventories have not changed, compare the percentage change in on-road motor vehicle emissions between the base year and attainment year using MOBILE5 and MOBILE6. If the percentage change in on-road motor vehicle emissions using MOBILE6 is the same or higher than the percentage change calculated with MOBILE5, a shortfall is not indicated and the SIP continues to demonstrate attainment.

  - If there appears to be a shortfall in the on-road motor vehicle inventory, or if the non-motor vehicle emissions inventories have changed, compare the percentage change in emissions between the old and new total SIP inventory (i.e., includes motor vehicle, stationary, area, and non-road mobile inventories). If the percentage change in the new inventory using MOBILE6 is the same or higher than the percentage change in the old inventory using MOBILE5, the SIP continues to demonstrate attainment. If the new total SIP inventory shows a smaller percentage change than the old one, a shortfall is indicated.

  - Calculate the amount of the shortfall in tons per day, by calculating the difference in the percentage change (i.e., percentage change in the old inventory minus the percentage change in new inventory), and multiplying the difference times the new (MOBILE6-based) base year inventory.

As stated in the January 18, 2002, guidance, if a shortfall is indicated, the state must describe the amount of the shortfall by precursor (i.e., VOC and NOx), and submit, as part of the MOBILE6 SIP revision, an enforceable commitment to do one of the following in its mid-course review: 1) submit additional measures needed to fill any emission reduction shortfall (if a shortfall is confirmed in the mid-course review); or 2) document that the mid-course review reflects that there is no emission reduction shortfall.

If you have any questions or further clarification is needed please contact either Gary Dolce (734-214-4144) or Ellen Baldridge (919-541-5684).

cc: Air Program Managers