

PM2.5 SIPs & Transportation Conformity

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Overview

- Motor vehicle emissions budgets (MVEBs)
 - Direct PM_{2.5} budgets
 - Precursor budgets
- Insignificance determination for transportation conformity purposes

MVEBs

- The transportation conformity rule defines the term “motor vehicle emissions budget.”
- MVEBs are the on-road mobile source portion of the SIP’s overall emissions inventory.
- MVEBs are included in:
 - Reasonable further progress (RFP) plans;
 - Attainment demonstrations; &
 - Maintenance plans contain budget.
- Transportation conformity enforces SIP budgets as a ceiling .

MVEBs Minimum Criteria

- Submitted control strategy SIP revision endorsed by Governor or designee & was subject to public hearing.
- Consultation among Federal, state & local agency occurred; documentation in SIP.
- MVEBs clearly identified & precisely quantified.
- MVEBs consistent with purpose of SIP (attainment, maintenance or RFP).

MVEBs Minimum Criteria – Cont.

- MVEBs consistent & clearly related to emissions inventory & control measures in the SIP.
- Documentation of any changes to previously submitted MVEBs & explanation of difference.

Other Considerations for MVEBs

- Use the latest motor vehicle emissions factor model
 - MOBILE6.2 for vehicle emissions (CA has its own model)
 - If road dust is significant, use AP-42 or EPA-approved local method
- Use the latest planning assumptions that are available.

Direct PM2.5 Budgets

- SIPs must include a direct PM2.5 budget for conformity purposes, unless on-road regional emissions are determined to be insignificant under 40 CFR 93.109(k) of the conformity rule
- Direct PM2.5 budgets would always include on-road vehicle exhaust and brake and tire wear emissions
- Re-entrained road dust and highway and transit construction dust would only be included in limited cases (i.e., when these dust emissions are a significant contributor)

PM2.5 Precursor Budgets

- A budget would be established for a PM2.5 precursor if on-road emissions need to be addressed to attain
 - E.g., where NO_x is considered an attainment plan precursor, and on-road emissions are significant
- A budget would not be established for a PM2.5 precursor if on-road emissions were considered insignificant to attain
 - E.g., where VOC or ammonia is not an attainment plan precursor for the overall SIP strategy
 - E.g., where on-road SO₂ is considered insignificant

What if there are no MVEBs for known pollutants or precursors related to the control strategy SIP or maintenance plan?



Insignificance under Transportation Conformity

- The conformity rule allows States to not create a SIP budget when:
 - A pollutant or precursor is significant to the SIP's overall strategy, but
 - The on-road portion of this overall strategy is insignificant
- This provision does not affect when PM_{2.5} precursors are considered significant or insignificant from a broader PM_{2.5} SIP planning perspective.

Insignificance under Transportation Conformity

- 40 CFR 93.109(k) has factors to consider:
 - % of on-road emissions in context of total inventory
 - Current state of air quality per monitoring data
 - Absence of on-road controls, and
 - Historical trends and future growth projections of on-road emissions
- Conformity provision used in limited cases
 - E.g.,: small PM10 areas dominated by stationary or area sources (no PM10 budget), small ozone areas with large biogenic sources (no VOC budget)

Resources

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- Conformity Website
 - <http://www.epa.gov/otaq/stateresources/transconf/index.htm>