Appendix A

Air Quality Conformity Determination

The Dayton/Springfield air quality Region (D/S Region) is comprised of the Counties of Clark, Greene, Miami, and Montgomery in southwest Ohio. Three counties (Clark, Greene, and Montgomery) are designated attainment/maintenance for the Annual PM2.5 Standard. The Clark County-Springfield Transportation Coordinating Committee (CCSTCC) and the Miami Valley Regional Planning Commission (MVRPC) have agreed that the MVRPC shall serve as the lead agency in the Dayton-Springfield Air Quality Control Region (AQCR) for purposes of air quality planning in cooperation with the Ohio Environmental Protection Agency, the Regional Air Pollution Control Agency, and the Ohio Department of Transportation. Conformity is completed in consultation with the CCSTCC, the OKI, the Ohio Department of Transportation (ODOT), the Ohio Environmental Protection Agency (OEPA), the United States Environmental Protection Agency (US EPA), and the Federal Highway and Transit Administrations (FHWA and FTA).

The Clean Air Act and subsequent amendments require a Plan and TIP conformity determination for areas like the Dayton/Springfield Region. Because the D/S Region is represented by two different MPOs, close coordination is required between MVRPC and CCSTCC during this process. Board resolutions by each MPO will acknowledge the respective MPO's transportation plans and conformity processes assuring that the MPO's conformity determinations accurately reflect emissions of future transportation projects.

- Region wide ridesharing programs
- Biking and Pedestrians Alternative modes of traveling
- Improved and Expand Park & Ride Lots
- Air Alert Advisory Days
- Transit Improvements
- Traffic Flow Improvements

The ODOT Modeling and Forecasting section performed the MOVES run to generate travel demand model based emission factors as well as the complete air quality analyses for Clark County.

Latest Planning Assumption

The annual PM2.5 regional emissions analysis meets the latest planning assumption requirement. The modeling process used to develop each MPO emissions is calibrated using the latest population and land use data available and is validated using corresponding traffic count data. Currently, the travel demand models are validated to year 2000 (CCSTCC) or year 2005 (MVRPC) depending on available data.

US EPA's most recent emissions software, MOVES, is used for all mobile source emission analyses with MOVES inputs being established at various interagency consultation meetings between November 2010 and April 2012. It was also established at these meetings that annual emission estimates for PM2.5 would be based on a single-season approach. Since travel demand models produce average daily conditions, the daily emissions estimates are multiplied by 365 to produce annual emissions estimates expressed in tons per year. Final budgets were approved on September 26, 2013 (78 CFR 59258) for PM2.5 and revised MOVES based budgets were approved on October 24, 2013 (78 CFR 63388) for ozone.

Interagency consultation meetings took place in January 2015 to address issues specific to the SFY2016-2019 TIP conformity determination. Following these meetings, analysis years were established as follows:

- 2020 – analysis year within 5 years of the conformity determination year
- 2022 - Budget year
- 2030 - Interim year
- 2040 - Plan(s) horizon year

1997 Ozone Revocation Update – March 2015

On March 6, 2015, U.S. EPA published the final rule for the *Implementation of the 2008 NAAQS for Ozone: State Implementation Plan Requirements*, 80 FR 12264, effective April 6, 2015. The final rule revokes the 1997 ozone standard for all purposes including transportation conformity. Therefore, segments of the Technical Memo that apply to the ozone emissions assumptions have been removed as a regional emissions analysis for ozone is not needed. The interagency consultation partners agree with this approach.

Table 1 presents a summary of emissions for the applicable counties in the D/S Region for the required precursor: direct PM and NOx for the PM2.5 standard. The results indicate that the 2040 Plan and TIP demonstrate conformity to the PM2.5 State Implementation Plans (SIPs) consistent with the April 2012 US EPA Transportation Conformity Regulations.

Table 1 – Dayton/Springfield Region On-Road Mobile Emissions – PM 2.5

	PM 2.5					
	Tons / Year					
	2015 Budget	2020 Emissions	2022 Budget	2022 Emissions	2030 Emissions	2040 Emissions
GRE/MOT						
PM2.5		192.72		174.62	153.15	155.20
NOx		4,995.57		4,156.47	2,867.44	2,531.57
CLA						
PM2.5		45.99		41.68	37.52	39.13
NOx		1,293.01		1,087.55	790.41	728.39
Totals						
PM2.5	404.43	238.71	261.33	216.30	190.68	194.14
NOx	12,865.54	6,288.59	6,270.64	5,244.03	3,657.85	3,252.96

11/8/10 Call
Interagency Consultation
Annual PM2.5 Redesignations Planning
Dayton-Springfield Area

Minutes

Participants:
Nino Brunello - ODOT
Ana Ramirez - MVRPC
Lamar Daniel – Clark County
Patricia Morris – USEPA Region 5
Carolina Prado – Ohio EPA

Call objective:

- Annual PM2.5 redesignation planning for the Dayton-Springfield nonattainment area.
- Model mobile emissions for PM2.5, NOx and SO2.
- Years to be model: 2005 (base nonattainment year), 2008 (attainment year), 2015 (interim budget year), and 2022 (maintenance budget year).
- Agree upon responsibilities and timing for the generation of on-road (mobile) emissions as part of the annual PM2.5 redesignation requirements for the Dayton-Springfield area.

Agreements:

- ODOT will develop the Emission Model database and submit it to MVRPC.
- MVRPC will develop the Travel Model database and combine it with the Emission Model to run MOVES.
- ODOT will develop Dayton-Springfield assumptions document similar to those used in the Columbus area assumptions protocol. MVRPC will assist as needed.
- MVRPC will provide final protocol write up on the procedures, steps and assumptions used to run MOVES and obtain mobile emissions.
- OEPA will review data and justify, if appropriate, insignificance of SO2.

Timeline:

November 17, 2010 – ODOT will submit assumptions protocol draft to OEPA for distribution for comments.
November 23, 2010 – All IAC group comments on protocol assumptions should be sent back to ODOT.

December 7, 2010 – ODOT will distribute final protocol assumptions.
Mid December 2010 – ODOT will have Emission Model completed.
Mid January 2010 – MVRPC will have mobile emissions runs completed and write-up. Will be provided to OEPA.

OEPA will provide notice to all persons on this list when draft redesignation request out for comment.

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*Margin of safety to be added to 2015 and 2022 mobile budgets will be discussed in next call.

Next Call Dayton-Springfield redesignation
Carolina Prado [Carolina.Prado@epa.state.oh.us]
Sent: Wed 11/10/2010 4:35 PM
To: ldaniel@clarkcountyohio.gov; Leigh.Oesterling@dot.gov; Nino.Brunello@dot.state.oh.us; Patricia Morris; Jennifer Hunter; aramirez@nvroc.org

IAC group,

Based on your responses to my previous email, our next PM2.5 redesignation call for the Dayton-Springfield area will on December 14, 2010 at 10:00am EST Please call 614 387-7405

Thanks,
Carolina

Carolina M. Prado
State Implementation Plan (SIP) Development Ohio EPA, Division of Air Pollution Control 614-644-2310 Carolina.Prado@epa.state.oh.us

Fine Particulate Matter ($PM_{2.5}$), Annual Standard

Several parameters have been identified for use in the preparation of this analysis. The parameters listed below will be applied in the base MOVES setup:

- Pollutants to be monitored: SO_2, NO_x, and $PM_{2.5}$
- Model years: 2005, 2008 (leap year), 2015, and 2022 (reflecting the most recent correspondence from EPA)
- MOVES modeling technique: Emission Factor method
    - Rates per Distance
    - Rates per Vehicle
    - (Rates per Profile are used only for VOCs)
- Scale: Custom domain
- Time Span:
    - Time aggregation: Hour
    - 1 month representing average annual temperatures
    - All hours of day selected
    - 16 speed bins
    - Weekdays only
- Geographic Bounds: Custom Domain – all counties in the MORPC area
- Vehicles/Equipment: All source types, gasoline and diesel
- Road Type: All road types including off-network
- Pollutants and Processes: NO_x, All $PM_{2.5}$ categories, SO_2, Total Energy Consumption
- Strategies: none
- General Output: Units = grams, joules and miles
- Output Emissions: Time = hour, Location = custom area, on-road emission rates by road type and source use type.
- Advanced Performance: none

The following assumptions will be applied within the County Data Manager portion of the MOVES software package. Each parameter is identified, along with the source data that will be applied (if applicable).

- Source Type Population: Combination of local and default data. Local data (2010) ODOT from motor vehicle registration data. Default data used for source types 41, 61, and 62. Future year growth rate based on MPO model variable Household growth rate
- Vehicle Type VMT: Combination of local and default data. HPMSVTypeYear VMT = daily VMT from travel demand model with EPA's daily to annual VMT converter applied. monthVMTFraction = default. dayVMTFraction=default. hourVMTFraction=local.
- I/M Programs: I/M program information will be applied for 2005 where applicable.

- Fuel Formulation: Modify diesel sulfur fraction to match previous MOBILE inputs. Future runs will also be modified for reformulated gas, RVP, etc. for summer analyses.
- Fuel Supply: Using MOVES default data.
- Meteorology Data: Local data obtained from NOAA National Climatic Data Center. Data will consist of monthly high and low temperatures and daily relative humidity.
- Ramp Fraction: Using the base year travel demand model for VHT fractions. Future fractions will be assumed constant.
- Road Type Distribution: Use ODOT (and some WVDOT) county summary VMT categorized by federal functional classes
- Age Distribution: Combination of local and default data. Local data (2010) ODOT from motor vehicle registration data (also some WVDO data). Default data used for source types 41, 51, 54, 61, and 62. The same age distribution will be used for all analysis years.
- Average Speed Distribution: Using MOVES default data. Data source does not matter because it is ignored when calculating emission rates.
- Alternative Fuel Vehicle Types: Default file will be modified to reflect any CNG buses.

-----Original Message-----
From: Carolina Prado [mailto:Carolina.Prado@epa.state.oh.us]
Sent: Tuesday, December 14, 2010 2:44 PM
To: ldaniel@clarkcountyohio.gov; Leigh.Oesterling@dot.gov; Dave Moore; Nino.Brunello@dot.state.oh.us; Patricia Morris; Ramirez, Ana; Andy Roth
Cc: Jennifer Hunter
Subject: NEXT CALL: Dayton-Springfield redesignation

Thanks for your participation in today's call.

We will have a follow-up call on January 18, 2011 (Tuesday) at 10:00 AM EST.
The call in number is 614-387-7405, no access code required.

Thanks,
Carolina

Carolina M. Prado
State Implementation Plan (SIP) Development
Ohio EPA, Division of Air Pollution Control
614-644-2310
Carolina.Prado@epa.state.oh.us

-----Original Message-----
From: Carolina Prado [mailto:Carolina.Prado@epa.state.oh.us]
Sent: Monday, January 24, 2011 12:23 PM
To: ldaniel@clarkcountyohio.gov; leigh.oesterling@dot.gov; Dave Moore; Nino.Brunello@dot.state.oh.us; Patricia Morris; Jennifer Hunter; smapel@lcounty.com; cparasa@morpc.org; ngill@morpc.org; Ramirez, Ana; Andy Roth
Subject: Follow up call PM2.5 redesigantion - Columbus and Dayton areas

Based on our 1/18 conference call we are in target to get all the mobile information by the end of January!!
We will like to setup a follow up call on February 8th* at 1:00PM only if we do not get the agreed information. MORPC and MVRPC are in charge of sending the final mobile numbers.

*During our last call we agreed on having a follow up call on Feb 7, unfortunately we had to move it one day due to the lack of enough phone lines.

Please call 614-644-4743)

Thanks,

Carolina M. Prado
State Implementation Plan (SIP) Development
Ohio EPA, Division of Air Pollution Control
614-644-2310
Carolina.Prado@epa.state.oh.us

Dayton-Springfield Ozone SIP MOVES Update
Minutes 8/24/2011

Attending: ODOT employees Dave Moore, Monica Drake, Mark Byram, Nino Brunello, and Andrew Shepler, Jennifer Hunter - OEPA, Pat Morris – US EPA, Ana Ramirez – MVRPC, Scott Schmidt – CCSTCC, Lamar Daniel – CCSTCC.

This air quality interagency consultation conference call was held to coordinate development of revision to the Dayton/Springfield 8-Hour Ozone SIP Maintenance Plan. The SIP revision will update the mobile source HC and NOx budgets to reflect US EPA's new MOVES software emission results. The SIP revision will be reviewed and approved via the federal register process.

Pat Morris confirmed that a full SIP revision is needed. She also confirmed that only the mobile source emissions will be updated, not point, area, etc.
Analysis years will be consistent with the existing Ozone SIP:

- 2002 - base year
- 2005 - attainment and budget year
- 2009 - interim non-budget analysis year
- 2018 - out year budget

Pat Morris confirmed that these four years are acceptable. When asked about using fewer years, Pat stated that it is helpful to have the runs for all four years.

Temperature and humidity inputs for the Ozone SIP Update will be consistent with the existing Ozone SIP, reflecting an average day in July. The existing SIP reflected temperature data from the ten hottest days of summer, 2002. Temperature minimum and maximum were provided by OEPA, correspondence is on file at ODOT and included in technical MPO memos. For MOBILE6 runs, hourly temperatures were established based on a daily profile ODOT developed from NOAA data. The MOBILE to MOVES translator applies a daily temperature profile in a similar manner and will be used for this SIP update.

Ana Ramirez asked Nino Brunello to prepare a protocol document recording the analysis input parameters to use as a guide for the technical documentation that MVRPC will produce. Nino agreed to transmit the document the week of August 29.

Latest Planning Assumptions:
Latest land use and population assumptions will be used. Therefore, 2018 forecasts will reflect the latest socio-economic conditions based on the 2010 Census and current Transportation Plan.

Emissions parameters will be consistent with the MOBILE based SIP runs, as follows:
2002 & 2005 will reflect E-check
2009 & 2018 will reflected RVP 7.8

A safety margin was not included in 2005. Pat Morris said that a safety margin could be added in future years if necessary. It was determined that the safety margins would be added if necessary after the runs are completed. 2005 will also be looked at prior to submission of the SIP.

Nino requested that for Ozone emissions, MOVES emission factors by source type (ie vehicle class) be used instead of the aggregated emission factors that have been used for PM2.5 analyses. This is a more detailed approach which should produce more accurate results, more defensible results. This request was approved. MVRPC agreed contingent on the results of comparisons between aggregate versus disaggregate emission factor methods. To insure deadlines are met, Nino will run the aggregate methodology first in case he runs into problems with the more detailed disaggregate methodology.

The schedule was discussed.

1) Emission factors will be provided to MVRPC by ODOT by mid-September.
2) Information would need to be submitted to OEPA & US EPA by mid-November.
3) The deadline for approved budgets is mid-February. OEPA will need three months to process.
4) US EPA will complete as much as possible concurrently with OEPA. Pat Morris stated that she will need 90 days and will need approval by OPEA to complete the budgets for approval.
5) The conformity finding needs to be complete by August 1, 2012.

The meeting concluded following the schedule discussion.

MOVES Ozone Inputs Technical Details

The summaries and the settings used in the MOVES run specification file and the MOVES County-Data Manager are shown below. Further details in specific inputs that are not using default values are provided below.

Parameters used for ozone analyses are similar to those used for PM analyses with the exception of: pollutants, additional profile emissions, analysis month, and the use of consecutive hourly temperature differences for calculation of the vapor venting process.

Instead of using average emission rates for the entire vehicle fleet, total emissions by individual source types will be calculated.

RunSpec Parameter Settings	
MOVES Version	MOVES2010A
Scale	Custom Domain
MOVES Modeling Technique	Emission Factor Method Rates per Profile (grams/vehicle) Rates per Distance (grams/mile) Rates per Vehicle (grams/vehicle)
Time Span	Time Aggregation: Hour 1 Month representing average summer temperatures All hours of day selected 16 speed bins Weekdays only
Geographic Bounds	Clark, Greene, Miami, and Montgomery Counties
Vehicles/Equipment	All source types, gasoline and diesel
Road Type	All road types including off-network
Pollutants and Processes	Total Gaseous Hydrocarbons, Non-Methane Hydrocarbons, Volitile Organic Compounds, NO_x, NO, NO_2, Total Energy Consumption
Strategies	None
General Output	Units = grams, joules and miles
Output Emissions	Time = hour, Location = custom area, on-road emission rates by road type and source use type.
Advance Performance	None

County Data Manager Sources	
Source Type Population	Combination of local and default data Local data (2010) ODOT from motor vehicle registration Default data used for source types 41, 51, 54, 61, and 62 Future year growth rate based on MPO model Household growth rate.
Vehicle Type VMT	Combination of local and default data HPMSVTypeYear VMT = daily VMT from travel demand model monthVMTFraction = default dayVMTFraction=default hourVMTFraction=local
I/M Program	I/M program information applied for 2002/2005 where applicable for all counties except Miami (Miami Co. is never had an I/M program)
Fuel Formulation	Default
Fuel Supply	Reformulated gas (RVP) for summer analyses
Metereology Data	Local data obtained from NOAA National Climatic Data Center. Data will consist of monthly high and low temperatures and daily relative humidity for 2002.
Ramp Fraction	Using the base year travel demand model for VHT fractions. Future fractions will be assumed constant
Road Type Distribution	Use ODOT county summary VMT categorized by federal functional classes
Age Distribution	Combination of local and default data. Local data (2010) ODOT from motor vehicle registration Default data used for source types 41, 51, 54, 61, and 62 The same age distribution will be used for all analysis years
Average Speed Distribution	Default
Alternative Fuel Type	Default

From: Brunello, Nino [mailto:Nino.Brunello@dot.state.oh.us]
Sent: Thursday, April 19, 2012 2:30 PM
To: PJividen@AkronOhio.gov; CBaker@akronohio.gov; Jeff Dutton; Bill Davis; Nick Gill (NGILL@morpc.org); Ramirez, Ana; Saleem Salameh; Lima (tmazur@lacrpc.com); smapel@lcounty.com; 'randy.durst@movrc.org' (randy.durst@movrc.org); sschmid@clarkcountyohio.gov; mikepap@bhjmpc.org; David Gedeon; rsharma@belomar.org; krodi@eastgatecog.org
Cc: Fred Durham; Dines, Jennifer; Patricia Morris (Morris.Patricia@epamail.epa.gov) (Morris.Patricia@epamail.epa.gov); Moore, Dave; Byram, Mark
Subject: FW: Ozone Summer Day Factors

All:

After discussions with ODOT, OEPA, WVDEP, and USEPA, we are of the opinion that there needs to be an additional seasonal factor for summer when calculating ozone pollutants.

There is currently an adjustment for increasing average daily VMT (+ 8%) which was used in previously when using Moblie6 to generate emission factors. With MOVES, there is a vehicle component used in addition to VMT, so there needs to be an adjustment from average number of vehicles to the number of vehicles in summer day. We propose to use the same 8% increase.

We need to have an inter-agency agreement on this, and would prefer to do it via email (to make it easier on all of us). Please respond with your approval and/or questions.

Thanks,

~~~~~~
Nino Brunello, P.E.
Modeling & Forecasting Section
Division of Planning
Ohio Department of Transportation
(614) 752-5742

From: Dines, Jennifer
Sent: Thursday, April 12, 2012 9:04 AM
To: Brunello, Nino; Durham, William F
Cc: Moore, Dave
Subject: RE: Ozone Summer Day Factors

Nino and Fred, talked to Pat and she agrees that BOTH VMT and number of vehicles should have the 1.08 factor applied.

Pat suggested we should have consultation on this. I told her ODOT is taking the lead on this project and I'd let Dave know……..she says email is fine.

Thanks,

Jennifer Dines
Manager, State Implementation Plan and Rulemaking Section
~~~~~~

Division of Air Pollution Control
Ohio Environmental Protection Agency
Wk (614) 644-3696
Fax (614) 644-3681

From: Brunello, Nino
Sent: Monday, April 09, 2012 12:59 PM
To: Dines, Jennifer; Durham, William F
Subject: RE: Ozone Summer Day Factors

Jennifer/Fred,

There is another item that needs to be discussed. Since we now calculate emission rates for both VMT and number of vehicles, does there need to be a summer adjustment factors for vehicles as well? This was not done with MOBILE, so we have nothing to follow. If I had to guess, I would think that there would be an increase, but I couldn't guess as to how many or what factor to use. Maybe just use 1.08 in absence of anything better? Thoughts?

~~~~~~

Nino Brunello, P.E.
Modeling & Forecasting Section
Division of Planning
Ohio Department of Transportation
(614) 752-5742

From: Dines, Jennifer
Sent: Monday, April 09, 2012 8:47 AM
To: Brunello, Nino; Durham, William F
Subject: RE: Ozone Summer Day Factors

I'm available

Jennifer Dines
Manager, State Implementation Plan and Rulemaking Section
Division of Air Pollution Control
Ohio Environmental Protection Agency
Wk (614) 644-3696
Fax (614) 644-3681

From: Brunello, Nino
Sent: Monday, April 09, 2012 8:30 AM
To: Durham, William F; Dines, Jennifer
Subject: RE: Ozone Summer Day Factors

I can call anytime. Will you both be around at 9:00? If not, when would be the next earliest time? (on the half hours)

-Nino
~~~~~~

From: Durham, William F [mailto:William.F.Durham@wv.gov]
Sent: Friday, April 06, 2012 8:50 AM
To: Brunello, Nino
Cc: Dines, Jennifer
Subject: Ozone Summer Day Factors

Nino:
I spoke with Jenn this morning and outlined the issue of Summer day VMT v. Average daily VMT.
We agreed that Pat Morris may be able to shed some light on the question.
Jenn & my calendars are open next Mon. and Tues. afternoon. Please give me a call & I'll patch Jenn in.
Fred

Ohio 2016-2019 STIP/TIPs
Air Quality Conformity Interagency Consultation
January 6, 2015 Conference Call Notes

An Ohio Air Quality Transportation Conformity Interagency Consultation conference call was held on January 6, 2015 to coordinate the transportation conformity processes for the 2016-2019 TIP for the following Ohio MPO/air quality areas:

- Canton (SCATS)
- Cincinnati (OKI)
- Cleveland (NOACA)/Akron (AMATS)
- Columbus (MORPC) /Newark (LCATS)
- Dayton (MVRPC)/Springfield (CCS-TCC)

The conference call proceedings followed the agenda, below and an accompanying *16-19 TIP conformity strategy.xlsx* spreadsheet. The conference call **outcomes** are recorded below.

Conference Call Participants:

Victor Botoson, AMATS	Chad Parasa, MORPC	Dave Moore, ODOT
Nino Brunello, ODOT	Cory Golden, CCS-TCC	Leigh Oesterling, FHWA
Bill Davis, NOACA	Matt Hill, LCATS	Amy Prater, AMATS
Jeff Dutton, SCATS	Drew Hurst, ODOT	Vince Rapp, ODOT
Karl Lucas, SCATS	Phyllis Jividen, AMATS	Andy Reser, OKI
Dan Slicker, SCATS	Tony Maietta, US EPA	Ana Ramirez, MVRPC
Jeff Dodson, SCATS	Mike Maleski, OEPA	Andy Johns, FHWA
Nick Gill, MORPC	Ed May, NOACA	

Agenda Items:

1. Review AQ status for respective areas
   Outcomes – The air quality status for the respective Ohio air quality areas was reviewed (*16-19 TIP conformity strategy.xlsx* spreadsheet, AQ Status Tab, columns D – G). Conference call participants confirm the accuracy of this information.

2. Confirm STIP/TIP air quality conformity strategy
   a. New analysis
   b. Reliance on previous analysis
      i. MPOs will confirm that recent TRAC Program project schedules updates are consistent with previous analyses.
   c. Confirm Youngstown, Toledo, Lima, as 1997 Ozone Standard areas, are exempt from conformity requirements

Outcomes – TIP transportation conformity can be established based on new regional emissions analyses or via reliance on previous conformity analyses (40 CRF 93.122(g). The strategy each Ohio air quality area will be employing for the 2016-2019 TIPs is recorded in *16-19 TIP conformity strategy.xlsx* spreadsheet, AQ Status Tab, column C. The conference call participants reviewed this information and following one correction for the Columbus/Newark are (revised to New Emissions Analysis) confirmed the accuracy of this information.

As a side note, FHWA also confirmed that the Lima, Toledo, and Youngstown regions, as solely 1997 Ozone standard areas, are exempt from transportation conformity.

Subsequent to this conference call, OKI provided email notice that upon further review of the region's 2016 – 2019 TIP projects, a new emissions analysis will need to be completed to demonstrate transportation air quality conformity. OKI also provided regional air quality status, budgets, and analysis years information to including on the *TIP conformity strategy.xlsx* spreadsheet, Cin Tab.

3. New analysis areas
    a. review conformity tests
    b. confirm applicable SIP budgets
    c. confirm analysis years
    d. latest planning assumptions
    e. latest emission modeling
        i. division of labor ODOT vs MPO for generating emissions
        ii. emissions for entire aq area
    f. Timely implementation of TCMs – Ohio SIPs do not include TCMs
    g. Schedules

Outcomes – This agenda item focused on reviewing the applicable Ozone and $PM_{2.5}$ SIP budgets and analysis years for MPOs that will be completing new regional conformity analyses 2016-2019 TIPs – Canton, Cleveland/Akron, Columbus/Newark, and Dayton/Springfield. The *16-19 TIP conformity strategy.xlsx* spreadsheet includes a tab, recording this information, for each of these air quality areas. The conference call participants reviewed the budgets and initial analysis year recommendations for each area. A good deal of discussion ensued regarding the appropriate first analysis year for the respective areas. Conference call participants were unable to achieve a consensus on this matter. US EPA agreed to research the matter and provide needed guidance. Following a series of telephone calls and email messages among FHWA-Ohio, US EPA-Region V, and OEPA, the following guidance was provided:

> **From:** Leigh.Oesterling@dot.gov [mailto:Leigh.Oesterling@dot.gov]
> **Sent:** Wednesday, January 21, 2015 8:58 AM
> **To:** Moore, Dave
> **Cc:** maietta.anthony@epa.gov; Maleski, Mike

Subject: Analysis Years for TIP Conformity - Follow-up to IAC mtg on 1/6/15

Dave,

Since our last IAC conference call on 1/6/15, I have coordinated with FHWA HQ, EPA Region 5, and Ohio EPA. While the conformity rule does not specify how to address budget years that are within one year of the first year of the plan, it does state that the regional emissions analysis are for the years in the "timeframe of the conformity determination." FHWA, EPA, and Ohio EPA, agree that a 2015 analysis year is outside of the 2016-2019 TIP timeframe, and therefore it is not appropriate to have an analysis year of 2015. EPA, Ohio EPA, and FHWA all concur that any year from 2016 to 2020 would be acceptable as the first analysis year, to be compared against 2015 budgets. Per the 1/6/2015 IAC meeting it is our understanding that the MPOs doing regional emissions analysis will likely use 2020 as their first analysis year.

We ask that a short explanation be included in the emissions analysis narrative to explain the selection of the analysis years, including or referencing information such as: 2020 represents the "build" condition of the 2016-2019 TIP, the reference to 40 CFR 23.118(d)(2) (see below), and the 1/6/2015 IAC meeting and the follow-up IAC communications, including this email.

40 CFR 23.118(d)(2): *the regional emissions analysis may be performed for any years in the timeframe of the conformity determination (as described under 93.106(d)) provided they are not more than 10 years apart and provided the analysis is performed for the attainment year (if it is in the timeframe of the transportation plan and conformity determination) and the last year of the timeframe of the conformity determination*

Thank you for your patience as we worked together to resolve this issue. Please "respond to all" if you have any questions or concerns,

Leigh

Leigh A. Oesterling, Planning & Environmental Team Leader
Federal Highway Administration – Ohio Division
200 N. High Street, Room 328
Columbus, OH 43215
(614) 280-6837
leigh.oesterling@dot.gov

The *16-19 TIP conformity strategy.xlsx* conformity year analysis tables have been updated to reflect the guidance referenced above. The respective areas' 2016 –

2019 TIP conformity analyses will be performed consistent with the analysis years identified in the updated *16-19 TIP conformity strategy.xlsx* spreadsheet.

Conference call participants coordinated work efforts, between ODOT and the MPOs, needed to prepare emission estimates for the respective areas – MOVES emissions factors, updated travel demand model analysis year networks, travel demand model runs. ODOT committed to providing needed MOVES emission factors by the first week of February, 2015.

4. STIP/TIP Conformity documentation
   Outcomes – conference call participants reviewed the standardized information that needs to be included in the TIP conformity documentation, including:
   - latest planning assumptions (MPO travel demand socio-economic variables)
   - latest emissions model – MOVES 2010A
   - interagency consultation results
   - document that Ohio SIPs do not include TCMs
   - analysis year network project lists
   - emission generation input/output documentation
   - Reminder that the final TIP public involvement effort needs to include the aq conformity documentation and results
   - Reminder that the TIPs need to demonstrate fiscal constraint
   - Reminder that the TIPs public information process needs to include response to any comments received

5. Include AQ conformity results in final STIP/TIP Public Involvement effort/event
   Outcomes – Agenda item addressed, above.

6. TIP approval resolutions to affirmatively make an MPO T-Plan/2016-2019 TIP conformity determination
   Outcomes –Reminder to MPO conference call participants that the MPO TIP approval resolution needs to include a “whereas” that the documenting the MPO Transportation Plan and the 2016-2019 TIP conform the region’s US EPA approved State Implementation Plan.

Dayton/Springfield 2016–2019 Transportation Improvement Program Conformity Analysis Summary

Ozone

Attainment status:	1997 8-Hour Ozone Maintenance Area
8-Hour Geography:	CLA, GRE, MIA, MOT Cos., OH
SIP Status:	Redesignation/Maintenance Plan approved, effective 8/13/07
Conformity Tests:	No longer required

$PM_{2.5}$

Attainment status:	1997 Standard $PM_{2.5}$ Nonattainment Area
Geography:	CLA, GRE, MOT Cos., OH
Conformity Tests:	Budget test based on budgets approved on 09/26/2013
Analysis Years:	2020 - 1st analysis year within timeframe of conformity determination 2022 Budget year 2030 Interim year 2040 Plan(s) horizon year

PM 2.5						
	Tons / Year					
	2015 Budget	2020 Emissions	2022 Budget	2022 Emissions	2030 Emissions	2040 Emissions
MVRPC						
PM2.5						
NOx						
CCS-TCC						
PM2.5						
NOx						
Totals						
PM2.5	404.43		261.33			
NOx	12,865.54		6270.64			

MVRPC 2016-2019 STIP/TIPs
Air Quality Conformity Interagency Consultation
Additional Ozone 1997 Issues

Wed 02/04/2015 11:53 AM

Ana,

Ohio EPA concurs with the analysis information below. Sorry for the late response.

Thanks,
Mike Maleski
Ohio EPA, Division of Air Pollution Control
614-644-1961

Tue 01/27/2015 10:03 AM

ODOT concurs.

Thanks
DM

From: Ramirez, Ana [mailto:ARamirez@mvrpc.org]
Sent: Tuesday, January 27, 2015 9:50 AM
To: Brunello, Nino; Golden, Cory; Anthony Maietta (Maietta.Anthony@epamail.epa.gov); Maleski, Mike; Andy Johns; Leigh Oesterling; Moore, Dave
Subject: Inter-Agency Consultation-1997 Ozone Dayton-Springfield Area

Good morning,

In the absence of guidance and to avoid getting caught in further litigation and risk missing the grace period for our new MOVES based ozone budgets, MVRPC has decided to conduct a regional ozone emissions analysis for the upcoming TIP. The table below documents the expected analysis years. Please let me know by COB Monday February 2, 2015 if you see any problems with the budgets, years, or tests described below. All other assumptions have been documented in the interagency consultation conference call notes from January 6, 2015.

Thanks,

Ana Ramirez

Ozone

Attainment status:	1997 8-Hour Ozone Maintenance Area
8-Hour Geography:	CLA, GRE, MIA, MOT Cos., OH
SIP Status:	Redesignation/Maintenance Plan approved, effective 8/13/07 New MOVES based budgets approved on 10/24/2013
Conformity Tests:	Pending further guidance, the following years would be analyzed.
Analysis Years:	2018 Budget year 2020 Interim year 2030 Interim year 2040 Plan(s) horizon year

OZONE					
	Tons / Day				
	2018 Budget	2018 Emissions	2020 Emissions	2030 Emissions	2040 Emissions
MVRPC					
VOC					
NOx					
CCS-TCC					
VOC					
NOx					
Totals					
VOC	22.35				
NOx	32.47				

1997 Ozone Standard Revocation - March 2015 Update

EPA Region 5 supports this approach

-Tony

Anthony Maietta
EPA Region 5
maietta.anthony@epa.gov
(312) 353-8777

From: Maleski, Michael [mailto:Michael.Maleski@epa.ohio.gov]
Sent: Monday, February 23, 2015 7:06 AM
To: Oesterling, Leigh; Moore, David; VBotosan@akronohio.gov; jrdutton@co.stark.oh.us; areser@oki.org; bdavis@mpo.noaca.org; ngill@morpc.org; aramirez@mvrpc.org; SSalameh@ntelos.net; tmazur@lacrpc.com; mschumaker@lacrpc.com; mhill@lcounty.com1; tracy.higgins@movrc.org; sschmid@clarkcountyohio.gov; mikepap@bhjmpc.org; gedeon@tmacog.org; rsharma@belomar.org; krodi@eastgatecog.org; Brunello, Antonino; Giaimo, Gregory; Turner, Natasha; Andy.Johns@dot.gov
Cc: Shepler, Andrew; Hurst, Andrew; Rapp, Vincent; Maietta, Anthony; Perry.J.Keller@wv.gov; William.F.Durham@wv.gov; Phinney, Scott; PJividen@akronohio.gov; rlane@mpo.noaca.org; rkoehler@oki.org
Subject: RE: The SIP Requirements Rule for the 2008 Ozone NAAQS Has Been Signed

Ohio EPA also supports ODOT's recommendations.

Mike Maleski
Ohio EPA, Division of Air Pollution Control
614-644-1961

From: Leigh.Oesterling@dot.gov [mailto:Leigh.Oesterling@dot.gov]
Sent: Monday, February 23, 2015 8:04 AM
To: Moore, David; VBotosan@akronohio.gov; jrdutton@co.stark.oh.us; areser@oki.org; bdavis@mpo.noaca.org; ngill@morpc.org; aramirez@mvrpc.org; SSalameh@ntelos.net; tmazur@lacrpc.com; mschumaker@lacrpc.com; mhill@lcounty.com1; tracy.higgins@movrc.org; sschmid@clarkcountyohio.gov; mikepap@bhjmpc.org; gedeon@tmacog.org; rsharma@belomar.org; krodi@eastgatecog.org; Brunello, Antonino; Giaimo, Gregory; Turner, Natasha; Andy.Johns@dot.gov
Cc: Shepler, Andrew; Hurst, Andrew; Rapp, Vincent; Maleski, Michael; Maietta.Anthony@epamail.epa.gov; Perry.J.Keller@wv.gov; William.F.Durham@wv.gov; Phinney, Scott; PJividen@akronohio.gov; rlane@mpo.noaca.org; rkoehler@oki.org
Subject: RE: The SIP Requirements Rule for the 2008 Ozone NAAQS Has Been Signed

FHWA Ohio Division supports ODOT's recommendations below.

Leigh A. Oesterling, Planning & Environmental Team Leader
Federal Highway Administration – Ohio Division
200 N. High Street, Room 328
Columbus, OH 43215
(614) 280-6837
leigh.oesterling@dot.gov

From: Moore, Dave [mailto:Dave.Moore1@dot.state.oh.us]
Sent: Monday, February 23, 2015 7:36 AM
To: Botosan, Victor (VBotosan@akronohio.gov); 'Jeff Dutton'; Andy Reser ; Bill Davis ; ngill@morpc.org; aramirez@mvrpc.org; 'Saleem Salameh'; 'tmazur@lacrpc.com'; 'M Schumaker'; mhill@lcounty.com; 'Tracy Higgins (tracy.higgins@movrc.org)'; sschmid@clarkcountyohio.gov; mikepap@bhjmpc.org; 'DGedeon'; rsharma@belomar.org; krodi@eastgatecog.org; Brunello, Nino; Giaimo, Greg; Turner, Natasha; Johns, Andy (FHWA)
Cc: Shepler, Andrew; Hurst, Andrew; Rapp, Vincent; Maleski, Mike; Anthony Maietta (Maietta.Anthony@epamail.epa.gov); Oesterling, Leigh (FHWA); Perry J Keller (Perry.J.Keller@wv.gov); Fred Durham ; Phinney, Scott; Jividen, Phyllis; rlane@mpo.noaca.org; rkoehler@oki.org
Subject: FW: The SIP Requirements Rule for the 2008 Ozone NAAQS Has Been Signed

All,

Ohio continues to work toward developing a new 2016 -2019 STIP/TIP, scheduled for a July 1, 2015 US DOT approval. An outstanding question with respect to the new STIP has been whether transportation conformity needed demonstrated for the 1997 Ozone standard. This question resulted from the December 23, 2014 D. C. Circuit Court's decision (NRDC versus US EPA) that US EPA lacked authority under the CAA to revoke the conformity requirements for the 1997 Ozone standard transportation conformity.

The email stream and web link below, confirm that US EPA, will soon publish an - Implementation of the 2008 NAAQS for Ozone: State Implementation Plan Requirements - Federal Register Notice final rule. This final rule will also "revoke the 1997 ozone NAAQS for all purposes". "The expectation is that the notice will be published in about 2 weeks. It will be effective 30 days after publication. So, the effective date will be in late-March or very early April."

Based on this pending US EPA rule making and the anticipated March/April 2015 effective date, ODOT is recommending that the Ohio 2016 – 2019 STIP/TIPs not include 1997 Ozone standard conformity determinations. ODOT also recommends that this email stream be included in the STIP/TIPs transportation conformity interagency consultation documentation.

ODOT welcomes comments on this matter from the STIP/TIP federal and state review agencies and the Ohio air quality area MPOs.

Thanks
Dave Moore

ODOT Statewide Planning Manager

From: Kapichak, Rudolph
Sent: Friday, February 13, 2015 2:30 PM
To: Becoat, gregory; Benjamin, Lynorae; Blakley, Pamela; Bonifacino, Gina; Brown, Steven; Castro, Marina; Cooke, Donald; Donaldson, Guy; Farngalo, Zuri; Fehn, Curt; Fernandez, Cristina; Garcia, Ariel; Hamilton, Heather; Kelly, Johnj; Khadr, Asrah; Laurita, Matthew; Leslie, Michael; Loutan, Reema; Mahdavi, Sarvy; Maietta, Anthony; Mastro, Donna; Mays, Rory; McHale, Mary; Myers, Dianna; OConnor, Karina; Pepple, Karl; Riley, Jeffrey; Russ, Timothy; Schoellkopf, Lynde; Sheckler, Kelly A.; Simcox, Alison; Smith, Suzanne; Somerville, Amanetta; Spann, Jane; Tax, Wienke; Vagenas, Ginger; Vaupel, Claudia; Velez-Rosa, Emlyn; Wong, Richard; Zeman, Melanie
Cc: Patulski, Meg; Berry, Laura; Larsen, Astrid; Dolce, Gary
Subject: The SIP Requirements Rule for the 2008 Ozone NAAQS Has Been Signed

Regional Contacts:

Earlier this afternoon the Administrator signed the final 2008 ozone NAAQS SIP requirements rule. Among other things the final rule revokes the 1997 ozone NAAQS for all purposes. The pre-proposal version of the notice can be found at: http://www.epa.gov/airquality/ozonepollution/pdfs/20150213fr.pdf

Revocation of the 1997 ozone NAAQS is discussed in section IV.A. of the notice which starts on page 126 of the proposal.

The expectation is that the notice will be published in about 2 weeks. It will be effective 30 days after publication. So, the effective date will be in late-March or very early April.

Rudy Kapichak
State Measures and Transportation Planning Center
Transportation and Climate Division
Office of Transportation and Air Quality
US Environmental Protection Agency

e-mail: kapichak.rudolph@epa.gov
Phone: 734-214-4574

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