



**Revision to CO Maintenance Plan  
(Previously Approved December 14, 2000)  
to Revise Motor Vehicle Emission  
Budget with MOBILE6**

Presentation to  
Regional Air Quality Council  
February 6, 2003



## MOBILE6 Background

- EPA officially released MOBILE6 on January 29, 2002
- EPA issued policy guidance on use of MOBILE6 for SIP development and transportation conformity on January 18, 2002
- Interagency Work Group has been meeting periodically to address MOBILE6



## SIP Revisions

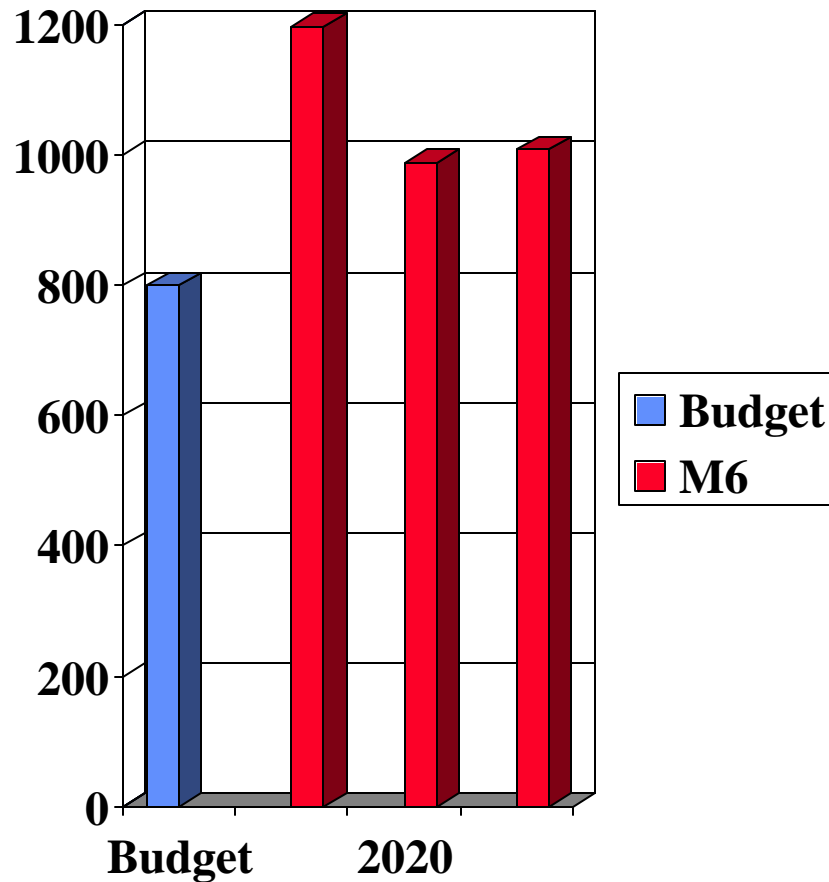
- Release of M6 does not require a SIP revision unless:
  - Revise control strategies
  - Revise motor vehicle emission budgets based on M6
  - Existing SIPs used interim credits for Tier 2 emission standards
- Guidance indicates EPA will work with States on a case-by-case basis to decide additional documentation, analyses, or commitments needed



# Conformity Provisions

- EPA and DOT have established a two-year grace period before M6 is required for new conformity determinations
  - All new conformity analyses started after the end of the grace period must use M6
  - Regional conformity analyses that begin during the grace period may continue to rely on M5
- SIP M6 emission budgets will likely be needed to avoid transportation conformity problems
- EPA guidance provides an expedited SIP revision process for new emission budgets

## CO SIP Budget



- Current budget = 800 tpd
- M6 emissions exceed current budget in all future horizon years
- M6 rate of decrease in emissions is greater than SIP/M5 (2001-2013)
  - SIP: 3% (825 tpd to 800)
  - M6: 27% (1526 tpd to 1098)



## Recommended Plan of Action

- CO SIP budget needs to be revised using M6 to avoid future conformity problems
  - Use expedited process to submit revision in 2003
  - EPA approval needed in early 2004 to avoid any potential conformity problems
  - Seek legislative pre-approval to expedite submittal to EPA

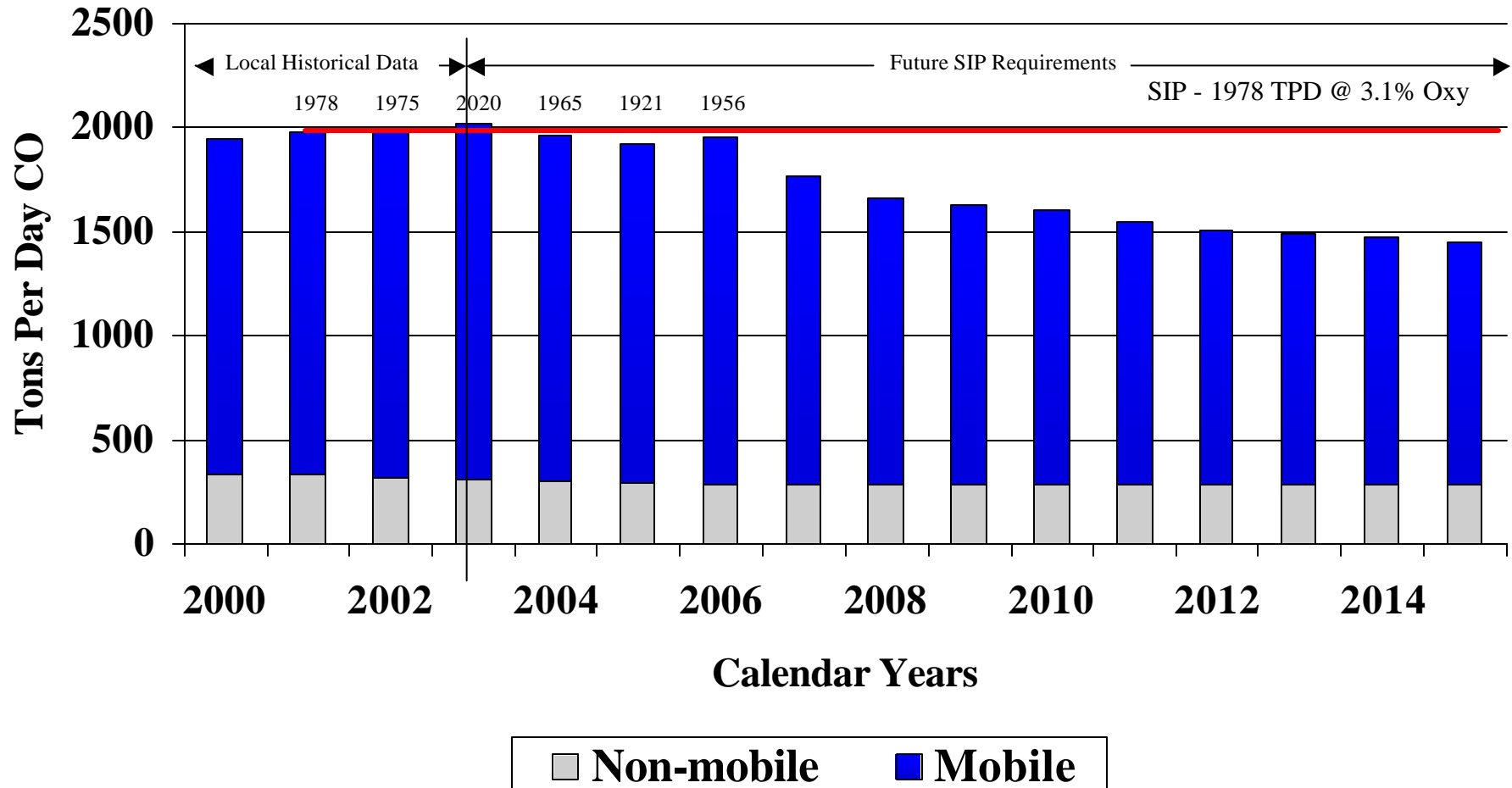


# Expedited Revision Process

- EPA guidance allows for an expedited process of updating emission inventories, maintenance demonstrations, and emission budgets using MOBILE6
- Two criteria:
  - Growth and control strategy assumptions for non-motor vehicle sources continue to be valid
  - SIP continues to demonstrate maintenance with M6 inventories (i.e., recalculated maintenance year emissions are less than recalculated base year emissions)

# Denver Metro CO Inventory

Maintenance Plan Control Strategies – Single Run M6 with 5b RSD Disbenefit Applied  
Current SIP Non-Mobile CO





## Proposed Schedule

- Feb 2003 RAQC approves proposed SIP revision and submits to AQCC for approval
- June 2003 AQCC public hearing and approval
- July 2003 Governor submits SIP revision to EPA



## Proposed Revision to Maintenance Plan

- No change to control measures contained in previously approved maintenance plan
- Develop attainment area emissions inventory from the modeling domain inventory in previously approved maintenance plan
- Demonstrate continued maintenance of standard
  - Maintenance year (2013) emissions 1347 tpd  
are less than base year (2001) emissions 1800 tpd



## Proposed Revision to Maintenance Plan (cont.)

- Proposed emissions budgets:
  - 1545 tpd - interim years (2006 through 2012)
    - Available “safety margin” 14 tpd
    - 12 tpd reserved; 2 tpd allocated to emissions budget
  - 1530 tpd - maintenance year (2013) and beyond
    - Available “safety margin” 453 tpd
    - 21 tpd reserved; 432 tpd allocated to emissions budget
- No changes to contingency provision or discussion of subsequent revisions.



# Legislative Approval

- Legislative pre-approval
  - Seek pre-approval from legislature during 2003 session
  - Governor can submit SIP revision to EPA as early as July 2003
- Normal legislative approval
  - SIP submitted to legislature at end of 2003
  - Legislative approval by Feb. 15, 2004 (no issues)
  - Governor can submit SIP revision to EPA as early as March 2004



# Legislative Pre-Approval

- Expedites submittal to EPA
- Expected EPA approval before or soon after expiration of conformity grace period (January 2004)
- EPA approval of budget revision could take place before further legislative/regulatory changes to strategies are adopted



# Strategy Re-evaluation Process

- Consider further revisions to I/M and oxygenated gasoline programs
- Developed an analytical methodology with EPA
- Will require revisions to CO, ozone, and PM-10 maintenance SIPs
- Analysis of options by fall 2003
- Recommendations to legislature for consideration in 2004
- SIP revisions developed thereafter