



Revising CO SIP Motor Vehicle Emission Budget with MOBILE6

Presentation to
Regional Air Quality Council
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SIP Revisions

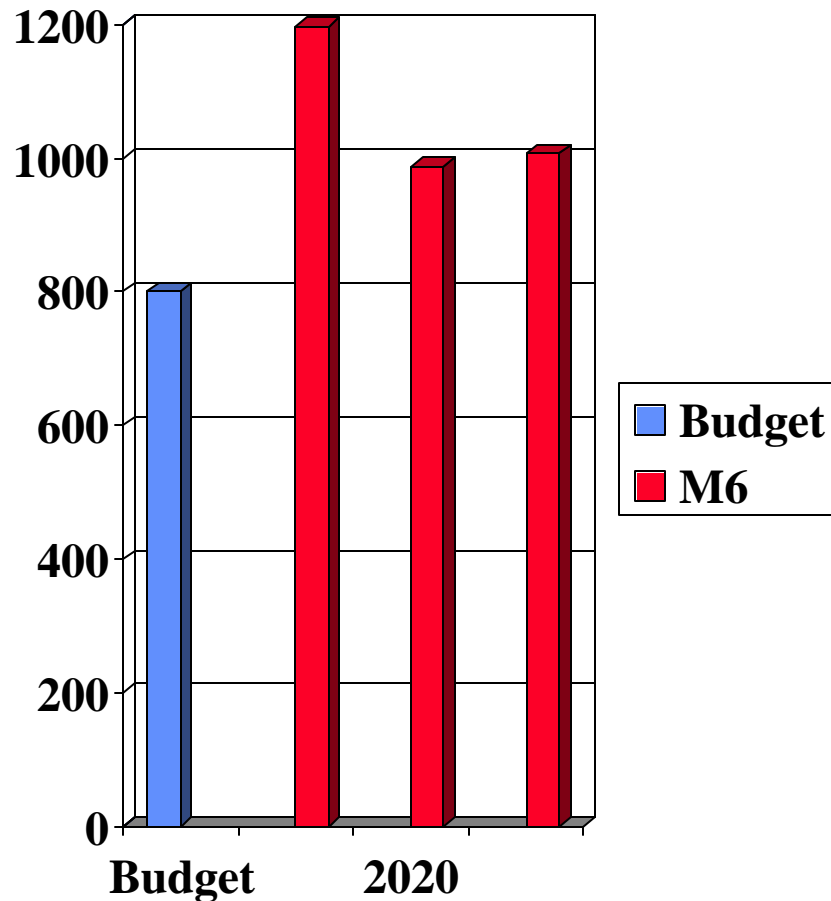
- Release of M6 does not require a SIP revision unless:
 - Revise control strategies
 - Revise motor vehicle emission budgets based on M6
 - Existing SIPs used interim credits for Tier 2 emission standards
- Guidance indicates EPA will work with States on a case-by-case basis to decide additional documentation, 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% (1500 tpd to 1100)



Recommendation

- 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
 - Consider seeking 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)



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Proposed Schedule

- Jan. 2003 Update SIP emission inventories and budgets with M6
- Feb. 2003 RAQC approves proposed SIP revision and submits to AQCC for approval
- June 2003 AQCC public hearing and approval
- Schedule dependent upon resolving a couple of remaining technical issues with EPA



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

- Negotiated an analytical methodology with EPA
- Will require revisions to CO, ozone, and PM-10 maintenance SIPs
- Current plan is to have analysis of options by fall 2003
- Recommendations to legislature for consideration in 2004
- SIP revisions developed thereafter