SUBJECT: EPA/STATE 2022 Collaborative Emissions Modeling Platform

The Metropolitan Washington Air Quality Committee (MWAQC) is the lead planning organization under Section 174 of the Clean Air Act for the area comprising the Washington D.C.-Maryland-Virginia 2015 ozone National Ambient Air Quality Standards (NAAQS) moderate nonattainment area. MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop plans to attain federal air quality standards as well as to maintain air quality after attainment.

The nonattainment area is currently attaining the 2015 ozone NAAQS. Staff from the three states as well as MWAQC have been crafting a redesignation request and maintenance plan for this standard. The creation of redesignation requests and maintenance plans is a required planning activity that protects air quality and ultimately results in the area shedding many anti-backsliding programs, such as transportation and general conformity. Court decisions have affirmed that no other solution exists for addressing anti-backsliding concerns for NAAQS that have not been revoked.

Redesignation requests and maintenance plans rely heavily on inventories, as mandated by federal guidance. These inventories include actual inventories for the base year (2017) and attainment year (2022) as well as projected inventories for the interim year (2032) and the out year (2038). To facilitate the development of the attainment year and projection year inventories that are suitable and appropriate for the use in state implementation plans (SIPs), states have spent considerable resources supporting the 2022 emissions modeling platform (EMP) collaborative, led by EPA. Collaborative inventories have several benefits in the SIP development process.

- They are easily reviewed by Region 3 staff and offer comprehensive, well-organized documentation.
- They are readily available in multiple formats for anyone to review and use.
- The modeling files (ff10 files) created for these collaborative efforts may be imported into the Emissions Modeling Framework (EMF) tool to develop emissions estimates in units of ozone season tons per day for each source classification code (SCC) in each jurisdiction, as required by Region 3 for redesignation requests and maintenance plans.
- The data sets have been reviewed multiple times by staff from across the United States, allowing staff expertise and knowledge from a wide variety of experience across different regions to improve the data sets.

For these reasons and many others, states considered the initial outlay of resources to develop the 2022 EMP as well worth the effort since the final inventories could be used for redesignation requests and maintenance plans as well as attainment plans.

However, information shared by EPA on recent 2022 EMP collaborative report out calls indicate that only 2022 and 2026 inventories will be available in final form. Draft data for 2032 and 2038 are available from the query tool, but no documentation has been provided for the 2032 and 2038 draft data sets. The draft 2032 and draft 2038 data sets

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are not available in ff10 file format. Therefore, importing the draft annual emissions projections for 2032 and 2038 into EMF to easily develop OSTD values by jurisdiction and SCC is not possible.

The inability to access such values from EMF is a major roadblock for the development of the nonpoint and marine/air/rail categories emission projections needed to support the redesignation request and maintenance plan. Other inventory sectors that rely on the MOVES tool (onroad and nonroad) allow users to develop OSTD values by SCC and jurisdiction as tool outputs. The point source and electricity generating unit sectors have calculational approaches that allow the development of OSTD values by SCC and jurisdiction with a reasonable amount of effort.   Without the use of EMF, the nonpoint and marine/air/rail categories are difficult to convert to OSTD values since the heterogeneous nature of the nonpoint sector requires the data set to undergo close scrutiny. Appropriate growth factors must be developed for each category of emissions, and the nonpoint sector contains a broad array of emissions categories. Also, SCCs that do not operate during the summer or tend to operate more frequently in the summer months must be identified since temporal patterns are important considerations when developing OSTD values from annual estimates.

MWAQC and state staff are quite concerned to learn that EPA is not willing to finalize and distribute the 2032 and 2038 inventories in ff10 format with full documentation. Even if these inventories are not useful for long term modeling strategies due to the uncertainty surrounding many federal rules, portions of these inventories could be quite useful to the state staff that spent many hours providing activity data, growth factors, and control factors as well as reviewing and commenting on draft data sets. Additionally, collaborative documentation saves the states from having to develop technical support documents for the 2032 and 2038 projection year inventories required for redesignation requests and maintenance plans.

The lack of inventory data has delayed the development of the redesignation request and maintenance plan for the Metropolitan Washington, D.C, 2015 ozone NAAQS moderate nonattainment area. Therefore, MWAQC and the staff of the State of Maryland, the Commonwealth of Virginia, and the District of Columbia request the following:

- Please make every effort to communicate to upper management the importance of publishing the full set of data for all collaborative years (2022, 2026, 2032, and 2038) in ff10 format in a timely manner, even if the data sets are marked as draft.
- Additionally, please make sure the importance of publishing timely and complete technical support documents for 2032 and 2038, even for draft data sets, is understood.
- If ff10 files for 2032 and 2038 are not available in a timely manner, staff in our agencies will begin developing the necessary nonpoint and MAR inventories using methodologies from past submissions. Such methodologies rely heavily on the use of the COG Cooperative Forecast as well as staff expertise. Staff will also develop technical support documents explaining the approaches used. If

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Region 3 has any guidance on how these inventories or support documents should be developed, please provide that information to state and MWAQC staff in the very near future.

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