

INITIAL DISCUSSION ON SECOND MAINTENANCE PLANS

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Maintenance Plan Submittal Requirements

- Two separate Maintenance Plans are required to be submitted for any air quality standard
- First Maintenance Plan outlines how an area will maintain its attainment of a federal air quality standard for 10 years into the future
- Second Maintenance Plan is required within 8 years of approval of the first Maintenance Plan to address maintenance for years 11-20 after an area is redesignated
- In absence of the second maintenance plan, the area will be required to keep demonstrating transportation and general conformity with that standard.

2008 Ozone Standard Maintenance Plan

- First Maintenance Plan was approved effective
May 15, 2019 – MD & VA
August 15, 2019 – DC
- Second Maintenance Plan submittal date: May 15, 2027
(8 years after effective redesignation date)
- Even though a new 2015 ozone standard exists, the submittal of the second Maintenance Plan is still required for the 2008 ozone standard as it still exists.
- Second plan must demonstrate maintenance through 2040 (10 years after the out year/final maintenance year of 2030 in the first plan)

2008 Ozone Standard Maintenance Plan

- Current regional ozone DV is 69 ppb (2023-25), which is at 92% of the 2008 ozone standard (75 ppb). This doesn't meet the criteria for a limited maintenance plan (need to be at or below 85% of the standard). A full second maintenance plan is required
- Likely milestone years could be attainment year 2014, interim year (2026 NEI year or 2027 if NEI data is not available in time) and the end of the second maintenance period (2040)

2008 Ozone Standard Maintenance Plan

- Contingency measures, ozone monitoring data, and emissions inventories for the above milestone years need to be included. This means updating onroad and nonroad inventories for 2014 and developing interim and final maintenance year inventories for all sources for 2026/27 and 2040 respectively
- Motor Vehicle Emissions Budgets (MVEBs) for 2014, 2026/27, 2040 need to be developed for transportation conformity purposes

1997 Annual PM2.5 Standard Maintenance Plan

- First Maintenance Plan was approved effective November 5, 2014
- Second Maintenance Plan submittal date was November 5, 2022
- Standard was revoked effective October 24, 2016
- Even with revocation, there may be a lingering requirement related to the consultation and fiscal constraint components of the transportation conformity that remains to be satisfied until the second maintenance plan is approved. Clarification from EPA is needed on this.
- Second plan would sunset at the end of 2035 (10 years after the out year/final maintenance year of 2025 in the first plan)
- Current regional ozone DV is 8.0 ug/m³ (2023-25), which is 47% below the 1997 annual PM2.5 standard (15 ug/m³). This meets the criteria for a limited maintenance plan (need to be at or below 85% of the standard).
- LMP would likely require the submittal of only the attainment year (2022?) inventory and other info such as, monitoring network, contingency measures, etc.

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