

# California Statewide Conformity Working Group

3/24/2010 Teleconference:

## **Meeting Notes**

Times are from the agenda. Afternoon session moved faster than planned.

**10:00 AM Introductions; housekeeping; agenda review**

**10:10 AM Public Comment on matters not on the agenda**

**10:20 AM Federal Updates**

## **Timeframe & procedures for PM2.5 conformity determinations**

**Timeframe:** Regional conformity for PM2.5 due (must be in place/determination made by FHWA) by 12/14/10. May need Interagency Consultation changes for hot spot analysis; hot spot requirements begin on 12/14 while regional conformity must be done by then.

**Consultation** (especially project-level) process issues affect mostly Butte, MTC – both have processes in place but must address the new standard. Other PM2.5 areas already have one.

### **Procedures:**

- If PM2.5 budgets available (from 1997 standard) use them for initial conformity determination.
- If no budgets available use interim test (build<no build, build<baseline=2008).
- Projects must show that they are not delaying timely implementation – how to demonstrate may eventually affect approach to CO – and will not create/worsen a localized PM hot spot.

## **Quantitative Analysis Guidance for PM Hot Spot Analysis**

EPA-OTAQ called in at 10:20

**Since last time:** EMFAC section is done; formatting in progress. Public draft release is close; resolving production issues. Public draft should be out in April (note: actual release in Federal Register was May 26 – see [EPA Conformity Policy web page](#)). 45-day comment period planned. More meetings will be available including a webinar. Expect a large document – covers 2 emission and dispersion models, mitigation measures, examples, locomotive emission method, reference materials, etc. Will repeat current guidance sections as needed. Final to be released asap after completing comment period, possibly by the end of summer.

**Question (consultant):** will there be traffic data guidance – how much and what kind? EPA: not much new traffic data guidance; will try to accommodate the range of data normally available. Will not expect analyses to be for every hour but do need good data. DO expect differences between Build & No Build!

**Question (ARB):** We talked about traffic when doing EMFAC chapter; is Caltrans interested in having guidance in EPA document? Do we need a followup document perhaps by UCD? EPA: type and QUALITY of traffic data are important; need confidence in speed data.

**More details:** CAL3QHCR for highways (only) and AERMOD (for all other, including complex, projects) will be required (not CALINE4). Intend training – will request that training needs be identified in comments. EPA is considering offering a spreadsheet for design value calculations, etc. Pass questions through Karina.

**ARB comment:** Don't expect much change from EMFAC2007 to EMFAC2010. Interested in data quality issue. EPA: We're trying to make the guidance long-lived and able to work w/new emission models.

**Question (consultant):** Will existing PM procedures (POAQC, emission analysis) continue to apply? Any examples available of good project assessments? EPA: Existing basic process will still exist – not every project will do full quantitative analysis. However, POAQCs will all need quantitative analysis after guidance is final – no more qualitative/emission analysis.

**GRACE PERIOD?** Yes for EMFAC and MOVES (probably full 2 years allowable). Completed NEPA documents w/no future conformity/environmental work will not be reopened by the guidance by itself (but see below for PM10 areas that add PM2.5).

**NEW PM2.5 AREAS THAT WERE FORMERLY PM10-ONLY:** Must re-do PM10 POAQC consultation to cover PM2.5. Consider identifying affected projects (not approved for construction before effective date – 12/14/10) and re-do consultation in a batch.

## **Other EPA matters, including:**

### **2008 Ozone standard reconsideration ([fact sheet](#))**

**EPA:** see schedule in fact sheet. 1997 standard was 0.08 ppm (0.084 with rounding). Was set in 2008 at 0.075 ppm. Now reconsidering @ 0.060-0.070 ppm (60-70 ppb) per terms of lawsuit suspension as a do-over of the 2008 decision. Also doing 5-yr review scheduled for completion in 2014. Agreed-on schedule is: sign final rule by 8/31/10. Accelerate designations – complete by 8/31/11. New conformity determinations probably due 9/12. Attainment SIPs due 4/2013 (complete attainment, RACT, RFP SIP). Implementation rule pending with classifications, probable revocation of old standard(s), grace period(s), etc.

### **2010 NO2 1-hour standard final 2/9/2010 ([FR notice](#))**

**EPA:** 100ppb 1-hour standard finalized in January. This standard has a NEAR-ROAD FOCUS. Set new monitoring requirements at not more than 50m from major roads (freeways). No current monitors meet requirements so initial designations likely all will be “unclassifiable” except Chicago. Monitoring Plans due 2012 with monitors running 1/2013. Nonattainment designations based on new monitors probably not before 2016 with SIPs due 18 mo. later. Attainment dates 5-10yr later. **Conformity requirements will not apply before 2017.**

**Question:** When will we get project-level analysis tools? EPA: Later; no date set for hot-spot requirements yet.

### **Lead standard ([LA part of South Coast nonattainment?](#))**

**EPA:** Transportation Conformity DOES NOT APPLY TO LEAD. Lead NAAQS rule says that in a footnote.

**Schedule:** NAAQS revised to add 0.15 ug/m3 (3-month rolling average) in October 2008. Nonattainment area recommendations from states were due 10/09;

**CA recommended** Imperial (Attainment); [LA portion of South Coast](#) (Nonattainment); otherwise Unclassified. Final designations are due in October 2010; 120-day letters due in June. EPA is addressing only KNOWN areas based on current monitors for 10/10; can update for 2nd round in 2011.

**Similar to NO2, has a requirement for new/more monitors:** by January 2010 for sources and population-oriented monitors by January 2011. Proposed changes – final soon – will drop source threshold (for monitoring) to ½ ton/yr and require population monitoring only at “NCORE” sites with more time to address extra sources brought in by changes. General Conformity applies 1 yr after designations. Standard is being litigated, but that doesn’t stay implementation.

#### **Proposed SO2 1-hour standard ([FR notice](#))**

**EPA:** First revision since 1990. Primary & secondary NAAQS have been split (as also for NO2). SO2 & NO2 secondary NAAQS covered in another rulemaking in progress; this is just primary. 11/16/09 proposal date driven by consent decree.

**New 1 hour standard proposed to be in range of 50-100 ppb** (possibly to 150). If in 50-100 range, would also revoke current 24 hour & annual standards. Additional monitors proposed; at least one per state with Regional Administrators able to add more.

**Final rule signature** due 6/2/10 per consent decree.

**CA:** current data for SLO show possible nonattainment (67 ppb is in the proposed range).

**No good information available regarding conformity effect** right now. Conformity is not covered in the fact sheet.

**Question/SCAG:** when will area designations happen? EPA: no clear schedule right now; may depend on having data from new monitors. Designation can take up to 2 years after a NAAQS is finalized, so soonest is probably mid-2012 with state recommendations in 2011. So 2013 for earliest conformity if applicable. EPA could take an extra year if needed.

#### **Recent sanctions clocks ([list](#))**

FHWA is working on getting its HQ sanctions site updated more often.

#### **Final PM Amendments Rule ([EPA web site](#))**

No significant discussion.

#### **Conformity Restructuring Rule**

EPA is still working on a restructuring amendment for conformity rule. Goal is to improve resilience given NAAQS changes; will specify more generic procedures. Draft proposal is in internal/DOT review.

#### **Other Federal issues as needed; significant litigation**

None

#### **ARB UPDATES**

**EMFAC** – new model addressing Latest Planning Assumptions (fleet data) to be released around the end of 2010.

*South Coast PM10 SIP* and budgets scheduled for Board meeting on March 25.

**Question/SANDAG:** is there a more detailed schedule for EMFAC rollout? ARB: management needs to decide will be in the revised model. Minimum revision is the LPA adjustments. Anything else isn't decided yet.

**SANDAG** is doing its RTP and conformity for 2050. EMFAC only goes to 2040. Is there a tool for extending emission factors? ARB: Will not forecast fleet in 2040 let alone 2050; so use alternate horizon year provision of conformity rule: use public process to identify appropriate year so 2050 becomes informational only. SANDAG discussing with FHWA & EPA.

## **12:00 Lunch**

## **1:00 PM Project-Level Conformity**

### **PM Hot Spot Procedures**

No further discussion.

### **CALINE4 use for non-CO analysis**

*Not required or usable at this time* for conformity analysis other than CO via CO Protocol.

*Do not use for PM hot spot analysis* – EPA expected to require [CAL3QHCR](#) or [AERMOD](#).

*CO Protocol* – should we schedule an update? EPA: no discussion/direction.

*NO2 mode available* when used from command line (DOS) or commercial interface (not CL4)

## **1:30 PM Status of Air Quality and Transportation Planning in California**

### **MPO & Air District Status Reports and Discussion**

([Caltrans Conformity Status Chart](#))

**SACOG:** No schedule set yet.

*Seems to be a quiet season for SIPs.* No special work happening regarding emission budgets right now; is there a need to update any? No further discussion.

**San Joaquin Valley:** Currently working on mid-course ozone SIP update; not changing emission budgets. Should be out for review in summer 2010.

**Cari SJV comment:** schedule for draft 2011 TIP-RTP-Conformity-EIR release is April 30 with July board adoptions. PM2.5 is done in parallel with & without emission budgets with choice to be made when final documents are ready to go. Studies are contingent on some existing amendments on the street being done. Interagency consultation for the RTP/TIP/conformity is done & comments are addressed so all that remains is production time.

**SANDAG:** Currently amending 08 RTIP – got approval 2/19. Doing 2010 RTIP project calls; started Interagency Consultation in March. Draft conformity analysis to be presented for Consultation in early May. Planning on 7/11 RTP adoption.

**SCAG:** Currently doing conformity work for 08 RTP amendment 3; Consultation is done and should go to policy committee & Regional Council next week. Currently reviewing local

submittals for 2011 FTIP; will adopt in October. 2012 RTP w/SB375 development is in the emission target-setting stage. Will use South Coast PM2.5 emission budget for independent analysis of 2008 amendment 3 and standard interim test for Imperial.

**2:45 PM    General Information Sharing**

*Next meeting* – September 2010, by teleconference

*Doug Eisinger*: requested ARB web link to consolidated emission budgets for the State. ARB: just use the EPA adequacy page. What should an ARB resource look like if different from EPA?

**3:00 PM    Adjournment**

Actually adjourned at about 2 PM.