UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

November 14, 2008

SUBJECT: Technical Support Document - Adequacy Findings for the Motor Vehicle Emissions Budgets in the 2008 Reasonable Further Progress Plan for the Pennsylvania Portion of the Philadelphia-Wilmington-Atlantic City 8-Hour Ozone Nonattainment Area

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TO: Administrative Record for the Adequacy Findings for the Motor Vehicle Emissions Budgets in the 2008 Reasonable Further Progress Plan for the Pennsylvania Portion of the Philadelphia-Wilmington-Atlantic City 8-Hour Ozone Nonattainment Area

THRU: Carol Febbo, Chief
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I. Administrative Requirements for Making Adequacy Findings

We have followed the process for determining the adequacy of the submitted State Implementation Plan (SIP) Motor Vehicle Emissions Budgets (MVEBs) in accordance with the procedures listed in the January 2008 Conformity Regulations contained in 40 CFR Part 93, §118(f) "Adequacy review process for implementation plan submissions".

On August 29, 2007, the Pennsylvania Department of Environmental Protection (PADEP) formally submitted a combined 2008 Reasonable Further Progress Plan (hereafter the 2008 RFP Plan) and 2009 8-Hour Ozone Attainment Demonstration Plan (hereafter the 2009 attainment demonstration) for the Pennsylvania Portion of the Philadelphia-Wilmington-Atlantic City 8-Hour Ozone Nonattainment Area as State Implementation Plan (SIP) revision.

This TSD is only addressing the MVEBs contained in the 2008 Reasonable Further Progress Plan.

On March 21, 2008, a notice was posted on EPA's web site entitled, "Adequacy Review of SIP Submissions for Conformity," located at: http://www.epa.gov/otaq/stateresources/transconf/adequacy.htm (Referred to as "EPA's website"), for the purpose of opening EPA's 30-day public comment period on the proposed MVEBs budgets in the Pennsylvania Portion of Philadelphia-Wilmington-Atlantic City 8-hour hour ozone attainment demonstration plan.

EPA's public comment period closed on April 21, 2008. EPA received no comments on the proposed MVEBs.

This TSD will be an enclosure to the letter from EPA to the PADEP informing the State of our findings on MVEBs of the 2008 RFP Plan for the area submitted on August 29, 2007.

We will publish a Federal Register notice announcing our adequacy findings. The effective date of the adequacy findings will be 15 days after the publication date of that notice. Once EPA has published the Federal Register notice, the letter we sent to PADEP and its enclosure, this TSD will also be posted at the EPA website.

Shown below in Table 1 is the 2 MVEBs from the SIP submittal.

Table 1
The Budgets of the Pennsylvania Portion of Philadelphia-Wilmington-Atlantic City 8-Hour Ozone Nonattainment Area 2008 RFP Plan

Plan Submittals	Milestone Year	Mobile Vehicle Emissions Budget for VOC-Tons Per Day	Mobile Vehicle Emissions Budget for NOx-Tons Per Day
Reasonable Further Progress Plan	2008	61.09	108.78

II. Evaluation of the Adequacy of the MVEBs Budgets in the 2008 RFP Plan for the Pennsylvania Portion of the Philadelphia-Wilmington-Atlantic City 8-Hour Ozone Nonattainment Area 8-Hour Ozone Non-attainment Area Submitted By the PADEP on August 29 , 2007

In this TSD, we are evaluating the MVEBs associated with the 2008 RFP Plan contained in the June 4, 2007 SIP submittal, for conformity purposes only. We are using the evaluation criteria detailed in the Transportation Conformity Rule, 40 CFR Part 93, § 93.118(e)(4) through § 93.118(e)(5). The evaluation is presented in Table 2, below.

Table 2
Adequacy of the MVEBs Contained in the 2008 RFP Plan for the Pennsylvania Portion of Philadelphia-Wilmington-Atlantic City 8-Hour Ozone Non-attainment Area

Transportation Conformity Rule 40 CFR Part 93, § 93.118	Review Criteria	Was the Criterion Satisfied? If "Yes" How was this Criteria Satisfied?
Sec. 93.118(e)(4)(i)	Was the submitted revised plan endorsed by the Governor (or his or her designee) and subject to a State public hearing?	Yes. The submitted RFP Plan was endorsed and submitted as a SIP revision by the Governor's designee, the Secretary of the PADEP, and a public hearing was held.
Sec. 93.118(e)(4)(ii)	Before the attainment demonstration was submitted to EPA, did consultation between federal, State and local agencies occur; was full implementation plan documentation provided to EPA, and was EPA's stated concerns, if any, addressed?	Yes. Consultation has occurred among all required federal, state and local agencies.
Sec. 93.118(e)(4)(iii)	Was the motor vehicle emissions budget(s) clearly identified and precisely quantified?	Yes, the budgets are clearly identified on page 48 of the August 29, 2007 submittal containing the, 2008 RFP Plan.
Sec. 93.118(e)(4)(iv)	Is the motor vehicle emissions budget(s), when considered together with all other emission reductions, consistent with applicable requirements for attainment demonstrations?	EPA believes the budgets can be declared adequate because in conjunction with the other emission reductions, they demonstrate reasonable further progress for 2008. These budgets serve to strengthen the SIP through continued progress towards attainment and ensure that

		motor vehicle emissions remain consistent with the emissions levels provided for in the SIP.
Sec. 93.118(e)(4)(v)	Is the motor vehicle emissions budget(s) consistent with and clearly related to the emissions inventory and the control measures in the Plan?	EPA believes that the budgets are clearly related to the emissions inventory and the control measures in the SIP submittal.
Sec. 93.118(e)(4)(vi)	Revisions to previously submitted attainment demonstrations: explain and document any changes to previously submitted budgets and control measures; impacts on point and area source emissions; any changes to established safety margins (see Sec. 93.101 for definition); and reasons for the changes (including the basis for any changes related to emission factors or estimates of vehicle miles traveled).	Yes. The SIP submission explains that the revised MVEBs are in response to EPA's 1997 revision to the previous ozone standard. This revision revoked the previous1-hour ozone standard and replaced with a more stringent 8 hour ozone standard.
Sec. 93.118(e)(5)	Did they provide and we review public comments and the State's responses to those comments with the submitted control strategy SIP?	There was one comment on the proposed mobile emissions budgets in the SIP. The PADEP responded in an adequate manner to the one comment.

III. Findings - Based upon our review and evaluation of the MVEBs contained in PADEP's August 29, 2007 submittal of the 2008 RFP Plan for the Pennsylvania Portion of Philadelphia-Wilmington-Atlantic City 8-Hour Ozone nonattainment area, we find the said MVEBs adequate for conformity purposes. These budgets serve to strengthen the SIP through continued progress towards attainment and ensure that motor vehicle emissions remain consistent with the emissions levels provided for in the SIP.

IV. The Applicable Motor Vehicle Emissions Budgets for Purposes of Demonstrating Conformity for 2008 in the Philadelphia Area - The applicable motor vehicle emissions budgets for purposes of demonstrating conformity are 61.09 tons/day of VOC and 108.78 tons/day NOx.