

July 1, 2004

To: Metropolitan Policy Committee

From: Susan Payne

Subject: Item 4.e(1)(i) Revision to State Implementation Plan for Carbon Monoxide.

**Action Recommended:** None – information only.

### **Issue Summary**

This memo serves to update MPC members on the task concerning the revision to the State Implementation Plan (SIP) for carbon monoxide (CO).

The Eugene/Springfield area was designated by EPA as in attainment of National Ambient Air Quality Standards for carbon monoxide in February 1994. As required under the Clean Air Act (CAA) Amendments of 1990, a ten year maintenance plan was submitted at the time of redesignation to attainment status. This maintenance plan has now expired and, in accord with Section 175A of the CAA, a new 10 year plan must be submitted as a revision to the current SIP.

The SIP describes the emissions budget and the control programs that must be in place to maintain CO emissions within the national standard. The MPO must demonstrate compliance with the SIP whenever an air quality conformity determination is triggered by changes in the long-range regional transportation plan (RTP) or transportation improvement program (TIP).

Because carbon monoxide levels in this area are now less than half of the national standard (9 ppm) and have been declining since 1980, EPA has indicated that they will consider permitting the MPO to submit a "limited maintenance plan" which is less rigorous than a full plan. This will expedite the revision process. Further, once this maintenance plan becomes effective, the MPO will no longer need to model regional CO emissions as part of an air quality conformity determination. By their approval of the limited maintenance plan, EPA would conclude that it is unreasonable to expect that an area will experience so much growth in the next 10 years that a violation of the CO standards would result. Continued monitoring of CO by Lane Regional Air Pollution Authority (LRAPA) will ensure that air quality is not compromised.

Development of the plan will be conducted by LCOG in collaboration with LRAPA and EPA, and in consultation with TPC/TASC, DEQ and USDOT. EPA requires a work plan with four phases each of which are described below with the anticipated timeline:

<b>Phase 1 – SIP Project Plan</b>	
July 12, 2004	<ul style="list-style-type: none"> <li>Complete preliminary SIP Development Plan -- identify the task components, the participants, and the timeline.</li> </ul>
	<ul style="list-style-type: none"> <li>Develop the plan more fully. Characterize the air quality problem. Define the analysis protocol, practices and procedures to demonstrate of the adequacy of the emissions control strategy.</li> </ul>
Aug 26, 2004	<ul style="list-style-type: none"> <li>Approval of final SIP Development Plan by TPC, LRAPA, EPA.</li> </ul>
<b>Phase 2 – SIP Development</b>	
	<ul style="list-style-type: none"> <li>Gather data, develop control strategies, demonstrate maintenance of attainment.</li> </ul>
Oct 8, 2004	<ul style="list-style-type: none"> <li>MPC review.</li> </ul>
Nov 25, 2004	<ul style="list-style-type: none"> <li>SIP document approved by TPC and sent to EPA for review.</li> </ul>
	<ul style="list-style-type: none"> <li>Finalize draft SIP document.</li> </ul>
Jan 13, 2005	<ul style="list-style-type: none"> <li>MPC review. Public Comment period opens.</li> </ul>
<b>Phase 3 – Public Involvement and Adoption</b>	
	<ul style="list-style-type: none"> <li>Public comment period of at least 45 days</li> </ul>
March 10, 2005	<ul style="list-style-type: none"> <li>Public hearing</li> <li>Submitted to MPC for adoption</li> </ul>
May, 2005	<ul style="list-style-type: none"> <li>Submitted to LRAPA Board and EQC for adoption</li> </ul>
June 28, 2005	<ul style="list-style-type: none"> <li>SIP submittal package to EPA</li> </ul>
<b>Phase 4 – EPA review and approval</b>	
	<ul style="list-style-type: none"> <li>EPA completeness check, technical and legal review.</li> </ul>
Dec 31, 2005	<ul style="list-style-type: none"> <li>EPA approval and notice in Federal Register</li> </ul>