United States Environmental Protection Agency, Region IX

Air Division

Technical Support Document

for

EPA's Notice of Adequacy
of Motor Vehicle Emissions Budgets
for ROG and NOx

1998 Clean Air Plan
California State Implementation Plan

Santa Barbara County Air Pollution Control District

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November 17, 1999

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AGENCY NAME: Santa Barbara County Air Pollution Control District (SBCAPCD)

Submitted SIP: "1998 Clean Air Plan - Santa Barbara County's plan to attain the state and federal ozone standards"

Adoption date: December 17, 1998

Submittal Date: March 19, 1999

SUMMARY

Transportation conformity is required by section 176(c) of the Clean Air Act. EPA's conformity rule (62 FR 43780) requires that transportation plans, programs, and projects conform to state air quality implementation plans (SIPs) and establishes the criteria and procedures for determining whether or not they do.

On March 2, 1999, the United States Court of Appeals for the District of Columbia Circuit issued a decision on the 1997 transportation conformity amendments (62 FR 43780). In response to the court decision, EPA developed an adequacy process to affirmatively find a SIP's emission budget adequate before the budget can be used in a Transportation Conformity analysis. The process is based on the procedures specified in 40 CFR 93.118(e)(4) and the process for determining the adequacy of submitted SIP budgets in EPA's guidance memo titled "Conformity Guidance on Implementation of March 2, 1999, Conformity Court Decision" (May 14, 1999).

PROCESS HIGHLIGHTS

The criteria by which we determine whether a SIP's motor vehicle emission budgets are adequate for conformity purposes are specified in 40 CFR 93.118(e)(4) as follows:

a.) Be endorsed by Governor and be presented in public hearings.

b.) Be developed through consultation with local, state and federal agencies.

c.) Achieve Reasonable further progress (RFP) attainment or maintenance with consideration of all emissions sources and growth.

d.) Include any new adopted and enforceable control measures or, at a minimum, include enforceable commitments by appropriate agencies for adoption of new measures(with implementation schedules), as well as any draft regulations or relevant documents.

e.) Present full plan technical documentation and address any EPA concerns.

Another equally important element of our adequacy review process described in EPA's May 14, 1999 guidance memorandum is the requirement for inclusion of substantive and technical documentation that supports the analysis and establishment of an area's mobile source emission budget as follows:

1.) Clearly identifies and quantifies emission budget(s).

2.) Indicates clear relationship between budget, control measures and total emission inventories.

3.) Explains and documents impacts on point and area sources from revisions to previously submitted SIPs and maintenance plans.

4.) Explains and documents any changes to submitted SIPs and maintenance plans, including revisions to motor vehicle budgets, control measures, emission factors and other impacting elements of an analysis or plan.

5.) Inclusion of record of comments and state/local responses from public hearing process.

The adequacy review is separate from EPA's completeness review; it is not an indicator of EPA's ultimate approval of the SIP. Despite a positive budget adequacy finding, the SIP could later be disapproved. Unlike adequacy, EPA's approval process requires a more detailed examination of the SIP's control measures and technical analyses. Although the minimum criteria for adequacy allows EPA to make a cursory review of the submitted control strategies, demonstrations, and motor vehicle emissions budget for conformity purposes, EPA recognizes that other elements of the SIP must also be considered for the plan to ultimately be approved.

EPA GUIDELINES

The provisions of the sections of Santa Barbara County's 1998 Clean Air Plan applicable to Mobile Source emissions inventories and budgets have been evaluated for consistency with EPA policy and the following documents:

1. Clean Air Act as Amended November 1990, Section 176(c)

2. State Implementation Plans for National Primary and Secondary Ambient Air Quality Standards, Section 110 of the Clean Air Act (CAA), and Plan Requirements for Nonattainment Areas, Title I, Part D of the CAA.

3. Requirement for Preparation, Adoption, and Submittal of Implementation Plans, U.S. EPA, 40 CFR Part 51.

4. Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule, U. S. EPA 40 CFR Part 51 and 93 , August 15, 1997

5. Conformity Guidance on Implementation of March 2, 1999 Conformity Court Decision, U.S. EPA Memorandum, May 14, 1999

ADEQUACY EVALUATION

Introduction

On December 10, 1997, EPA issued a final action finding that Santa Barbara county had not attained the federal 1-hour ozone standard by the statutory attainment date prescribed for moderate nonattainment areas. Thus, EPA reclassified the Santa Barbara County area as serious nonattainment by operation of federal law. The final EPA action mandates that Santa Barbara continue progress toward the federal 1-hour ozone standard through the development of a revised Clean Air Plan (CAP). The purpose of Santa Barbara County's 1998 Clean Air Plan is to comply with the additional federal planning requirements as imposed by EPA's action. The plan includes a Rate-of-Progress demonstration and an attainment demonstration of the federal 1-hour ozone standard by 1999. The plan defines on-road mobile source Reactive Organic Gases (ROG) and oxides of Nitrogen (NOx) emission budgets for the purposes of transportation conformity. These emission budgets are: a.) 1999 baseline ROG - 17.42 tons per day
and b.) 1999 baseline NOx - 22.07 tons per day.

Compliance to Process Criteria

The following table is an overview of Santa Barbara's 1998 CAP compliance to the ten (10) adequacy process criteria (listed above) inclusive of Items a.) to e.) and Items 1.) to 5.).

CRITERIA COMPLIANCE TABLE - SANTA BARBARA 1998 CAP	
Criteria Description and Citation[1]	State/Local Action or 1998 CAP Reference
a.) Governor endorsements/Public hearings per CAA 1990, Section 110(a) and (b)	Plan approval by California Air Resources Board -2/25/99 Plan submittal to EPA - 3/19/99 by Governor's designee
b.) Consultation per 40 CFR Part 93, Section 93.105	SBCAG/SBAPCD participated in bi-monthly interagency consultation meetings as required by APCD rule 701.[2] Each agency met its AQ and transportation planning responsibilities per SBCAG/SBAPCD MOU, June 1993. Any EPA concerns were addressed
c.) Achieved RFP, attainment or maintenance per 40 CFR Part 93, Section 93.118(e)(4)	1998 CAP inclusive of Chapters 7 and 9 (Attainment demo and Rate of Progress)
d.) Include adopted and enforceable control measures per 40 CFR Part 93, Section 93.1189(e)(4)	1998 CAP inclusive of Tables 5-1, 5-2 and 5-3 and Appendix C
e.) Full Plan, technical documentation and any EPA concerns per CAA 1990, Sections 110(a) and 182(d),(f) and (g)	SIP submittal currently under EPA review for approval
1.) identifies and quantifies emission budgets per EPA guidance Memorandum, May 14, 1999 and 40 CFR Part 93, Section 93.118(e)(4)	1998 CAP inclusive of pages 5-3, 5-4 and 5-5; Appendix C, Parts C.6 (On-road Emission Analysis) and C.7 (Emission Results)
2.) Indicates budget, control measures and emission inventories relationships per EPA guidance Memorandum, May 14, 1999	1998 CAP inclusive of Appendix C, Tables 2 and 3 and Part C.2 (Transportation Control Efficiency Calculations)
3.) SIP revision Impacts on point and area sources per EPA guidance memorandum, May 14, 1999 and 40 CFR Part 93, Section 93.118(e)(4)	1998 CAP inclusive of Table 1-1
4.) Explains SIP or Plan changes/revisions per EPA guidance Memorandum, May 14, 1999	1998 CAP inclusive of Chapter 10; Table 1-1; and Table 7 Appendix C

[1] The ten (10) adequacy criteria tabled below are delineated within this document under the section Process Highlights including their source authorities.

[2] Rule 701 is SBCAPCD's adoption of the Conformity Rule 40 CFR Part 93 modified in part to fit the district's specific needs. SBCAPCD Rule 701 will be undergoing review by EPA for approval pending revision of 40 CFR Part 93 due to court ruling of March 2, 1999.

5.) Inclusion of public comments and state/local responses (resulting from public hearing per EPA guidance memorandum, May 14, 1999	1998 CAP inclusive of Chapter 12 (Public Participation); EPA finds SB responses to comments sufficient/concise

Suggested EPA Action

Our review (based on compliance to all the process requirements and criteria) indicates that Santa Barbara County's 1998 Clean Air Plan (CAP) emissions budgets for 1999 meet the requirements and criteria specified in 40 CFR Part 93, Section 118(e)(4) and EPA's guidance Memorandum of May 14, 1999. EPA staff recommends an affirmative "adequacy finding" be issued regarding Santa Barbara County's 1999 mobile source emissions budgets for ROG and NOx and declaring those budgets as "adequate." The notice of our finding will be published in the Federal Register. Per our guidance Memorandum, our determination will become effective 15 days after the publication of the Federal Register announcement. On and after the effective date of our adequacy determination, Santa Barbara County's 1998 CAP emissions budgets specified for 1999 must be used in all Santa Barbara County Association of Governments' transportation plan conformity determinations as well as those determinations made by the US Department of Transportation regarding those plans.

Attachments

1. Conformity Guidance on Implementation of March 2, 1999 Conformity Court Decision, U.S. EPA Memorandum, May 14, 1999

2. Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule, U. S. EPA 40 CFR Part 51 and 93 , August 15, 1997