



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

September 9, 2003

Nancy Wrona  
Director, Air Quality Division  
Arizona Department of Environmental Quality  
1110 W. Washington Street  
Phoenix, Arizona 85007

Dennis Smith  
Executive Director  
Maricopa Association of Governments  
302 North 1st Avenue, Ste. 300  
Phoenix, Arizona 85003

Dear Ms. Wrona and Mr. Smith:

We have found adequate for transportation conformity purposes the motor vehicle emission budgets in the *Carbon Monoxide Redesignation Request and Maintenance Plan for the Maricopa County Nonattainment Area* (May 2003) ("2003 MAG CO Maintenance Plan"). As a result of our adequacy finding, the Maricopa Association of Governments (MAG) and the U.S. Department of Transportation are required to use these budgets in future conformity analyses.

On March 2, 1999, the United States Court of Appeals for the District of Columbia Circuit issued a decision on *Environmental Defense Fund v. Environmental Protection Agency*, No. 97-1637, that we must make an affirmative determination that the submitted motor vehicle emission budgets contained in State Implementation Plans (SIPs) are adequate before they are used to determine the conformity of Transportation Improvement Programs or Long Range Transportation Plans. In response to the court decision, we are making any submitted SIP revision containing a control strategy or maintenance plan available for public comment and responding to these comments before announcing our adequacy determination.

The Arizona Department of Environmental Quality (ADEQ) submitted the 2003 MAG CO Maintenance Plan to EPA by letter dated June 16, 2003, and we received this plan on June 24, 2003. The plan identifies CO motor vehicle emission budgets (calculated for Friday in December) of 699.7 metric tons per day (mtpd) in 2006 and 662.9 mtpd in 2015. We announced receipt of the plan on the Internet and requested public comment by July 28, 2003. We did not receive any comments on the plan during that comment period.

This letter transmits our decision that the motor vehicle emissions budgets in the 2003 MAG

CO Maintenance Plan are adequate for transportation conformity purposes. In reaching our decision, we have reviewed the plan, including responses to public comments on the plan, and have preliminarily determined that it will provide for the maintenance of the CO NAAQS for at least 10 years after redesignation.

We have enclosed a table that summarizes our evaluation of the plan with respect to our budget adequacy criteria and will soon post this information on the Internet at: <http://www.epa.gov/otaq/transp/conform/pastsips.htm>. We will also announce this adequacy determination in the Federal Register. This determination will become effective 15 days after the Federal Register announcement.

If you have any questions regarding this decision, please contact Wienke Tax at (520) 622-1622 or Colleen McKaughan at (520) 498-0118.

Sincerely,

*/s/ Matt Haber, for*

Jack P. Broadbent  
Director, Air Division

Enclosure (Adequacy Review)

cc: Bob O'Loughlin, FHWA  
Ed Stillings, FHWA  
Leslie Rogers, FTA  
Pat Cupell, ADOT  
Lindy Bauer, MAG

## Enclosure

### Transportation Conformity Adequacy Review

Control Strategy or Maintenance SIP under Review: MAG 2003 CO Redesignation Request and Maintenance Plan		Date of SIP Revision Receipt by EPA: 6/24/2003	
Reviewer: Wienke Tax		Date: 8/03	
Adequacy Review Criteria		Is Criterion Satisfied? Y/N	Reference in SIP Document / Comments
Sec. 93.118(e)(4)(i)	The plan was endorsed by the Governor (or designee) and was subject to a public hearing.	Y	The June 16, 2003 transmittal letter from ADEQ to Wayne Nastri references ARS § 49-104 and § 49-404 which delegate authority to ADEQ from the governor to adopt and submit plans. Appendix B, Exhibit 1 contains documentation of a public hearing on the plan on May 5, 2003.
Sec. 93.118(e)(4)(ii)	The plan was developed through consultation with federal, State and local agencies; full implementation plan documentation was provided and EPA's stated concerns, if any, were addressed.	Y	The process used for consultation with federal, State and local agencies and the public is described and documented on page 2-22 of the maintenance plan, and in more detail in Chapter 10, Public Participation, of the MAG 2001 CO Attainment Plan. Appendix B, Exhibit 1 of the maintenance plan contains the actual public comments received on the plan and responses to those comments. The responses adequately address all comments received.
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budget(s) is clearly identified and precisely quantified.	Y	The motor vehicle budgets are clearly identified and precisely quantified on pages ES-6 and 3-14 of the plan.

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Sec. 93.118(e)(4)(iv)	The motor vehicle emissions budget(s), when considered together with all other emission sources, is consistent with applicable requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given plan).	Y	Chapter 3 of the Carbon Monoxide Redesignation Request and Maintenance Plan describes how the level of emissions contained in the motor vehicle budget, with all other emission sources, will show maintenance through the year 2015 with a peak (eight-hour) CO concentration of 8.06 ppm in that year. We believe that the maintenance demonstration and modeling are adequate.
Sec. 93.118(e)(4)(v)	The plan shows a clear relationship between the emissions budget(s), control measures and the total emissions inventory.	Y	The emission inventory for all point, area and motor vehicle sources, and its relation to control measures, is described on pages 3-1 through 3-11 of the plan. Extensive information is provided in Appendix A as well.

Control Strategy or Maintenance SIP under Review: MAG 2003 CO Redesignation Request and Maintenance Plan		Date of SIP Revision Receipt by EPA: 6/24/2003	
Reviewer: Wienke Tax		Date: 8/03	
Adequacy Review Criteria		Is Criterion Satisfied? Y/N	Reference in SIP Document / Comments
Sec. 93.118(e)(4)(vi)	Revisions to previously submitted control strategy or maintenance plans explain and document any changes to any previous submitted budgets and control measures; impacts on point and area source emissions; any changes to established safety margins (see 93.101 for definition), and reasons for the changes (including the basis for any changes to emission factors or estimates of vehicle miles traveled).	Y	As described on page 3-14, the CO emissions budgets supplement the 2000 CO budget (412.2 metric tons per day) identified in the MAG 2001 CO Attainment Plan dated April 2001. The new emissions budgets (699.7 metric tons per day for 2006 and 662.9 metric tons per day for 2015) represent daily motor vehicle emissions for a Friday in December in the interim year 2006 and the last year of the maintenance plan, 2015, respectively. The new budgets are substantially different because, per EPA guidance, MAG has used the MOBILE6 model for estimating on-road mobile source emissions in the maintenance plan (whereas the attainment plan was modeled using MOBILE5).
Sec. 93.118(e)(5)	EPA has reviewed the State's compilation of public comments and response to comments that are required to be submitted with any implementation plan.	Y	A public hearing was held on May 5, 2003. Oral comments were received during this hearing. Written comments were received as well. MAG responded to all of the comments in their submitted maintenance plan.