



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

May 5, 2010

Leo M. Drozdoff, P.E.
Administrator
Nevada Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

Re: Adequacy Status of Truckee Meadows PM₁₀ Maintenance Plan Motor Vehicle Emissions Budgets

Dear ^{Leo} Mr. Drozdoff:

Pursuant to Section 93.118(e) of the Transportation Conformity Rule (40 CFR part 93, subpart A), EPA has reviewed the *Redesignation Request and Maintenance Plan for the Truckee Meadows 24-Hour PM₁₀ Non-Attainment Area* ("Truckee Meadows PM₁₀ Maintenance Plan"), that was submitted by the Nevada Division of Environmental Protection (NDEP) on July 13, 2009, as a revision to the Nevada State Implementation Plan (SIP). The focus of our review was to determine the adequacy of the motor vehicle emissions budgets (MVEBs) for particles with an aerodynamic diameter of a nominal 10 microns or less (PM₁₀) contained in this plan for purposes of transportation conformity. EPA's conformity rule spells out limited technical and administrative criteria that we must use in determining the adequacy of submitted MVEBs, and we have determined that these criteria have been satisfied for the PM₁₀ MVEBs contained in the submitted maintenance plan.

The Truckee Meadows PM₁₀ Maintenance Plan identifies PM₁₀ MVEBs for the Truckee Meadows nonattainment area for years 2009, 2013, 2018 and 2020. The budgets that we have determined to be adequate for purposes of transportation conformity are provided in the following table:

Truckee Meadows PM ₁₀ Maintenance Plan Motor Vehicle Emissions Budgets Truckee Meadows Nonattainment Area (winter season, pounds per day)	
2009 Emissions Budget	21,195
2013 Emissions Budget	20,871
2018 Emissions Budget	20,836
2020 Emissions Budget	20,816

We announced receipt of the Truckee Meadows PM₁₀ Maintenance Plan on the Internet on January 19, 2010 and requested public comment by February 18, 2010. We did not receive any comments on the budgets and plan during that comment period. As a result of our adequacy

finding, the Washoe County Regional Transportation Commission and the U.S. Department of Transportation must use these budgets in future conformity analyses.

In reaching this decision, we have reviewed the Truckee Meadows PM₁₀ Maintenance Plan. As noted above, we did not receive any comments on the budgets and plan during the public comment period. Although the adequacy criteria allow EPA to review submitted budgets for conformity purposes, EPA recognizes that other elements must also be in the SIP for it ultimately to be approved. EPA's adequacy review should not be used to prejudge EPA's approval or disapproval of the SIP, since additional information may be submitted and more extensive review may change some conclusions.

We have enclosed a table that summarizes our adequacy determination. We will soon post this information on the Internet at: <http://www.epa.gov/otaq/stateresources/transconf/adequacy.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 have your staff contact Eleanor Kaplan at 415-947-4147.

Sincerely,



Deborah Jordan
Director, Air Division

Enclosure

cc: Andrew Goodrich, Washoe County Health District
Duane Sikorski, Washoe County Health District, Air Quality Management Division
Daniel Inouye, Washoe County Health District, Air Quality Management Division
Susan Klekar, Federal Highway Administration
Hannah Visser, Federal Highway Administration
Ted Matley, Federal Transit Administration
Dennis Taylor, Nevada Department of Transportation
Debra Goodwin, Regional Transportation Commission of Washoe County

	requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given plan).		and 29 of the plan for a discussion of the derivation of the motor vehicle emissions budgets and how they are consistent with the seasonal emissions inventory provided in Appendix B of the plan. Based on our cursory review of the plan, we preliminarily find that the PM ₁₀ budgets (including the safety margins), when considered together with all other PM ₁₀ emissions sources projected for Truckee Meadows, are consistent with the requirement for maintenance plans to demonstrate maintenance of the NAAQS for 10 years beyond redesignation.
Sec. 93.118(e)(4)(v)	The plan shows a clear relationship among the emissions budget(s), control measures and the total emissions inventory.	Y	The emissions inventory for all point, stationary area, nonroad and on-road mobile sources is described in Appendix B of the plan, as well as on pages 27-29. Page 10 describes the federally enforceable control measures and their respective emission reductions. Pages 22-25 describe the emissions inventories and baselines used to project future year emissions. The plan uses a 2005 emissions inventory to develop an emission budget and carrying capacity for 2006 of 36,400 pounds per day (winter season), which is used as the maximum limit for overall emissions to meet the PM ₁₀ NAAQS.
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 VMT.	Y	The Truckee Meadows PM ₁₀ Maintenance Plan that was submitted on July 13, 2009 is the first PM ₁₀ maintenance plan submitted for the Truckee Meadows nonattainment area. Truckee Meadows was initially classified under the Clean Air Act Amendments of 1990 as a “moderate” PM ₁₀ nonattainment area but was later (in 2001) reclassified as “serious.” Because EPA did not find adequate, or approve, the MVEBs in previously submitted plans addressing the requirements under the Clean Air Act for “moderate” or “serious” PM ₁₀ nonattainment areas, the Truckee Meadows PM ₁₀ Maintenance Plan provides the first set of PM ₁₀ budgets for the area.
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 notice of the public hearing was published in the Reno Gazette-Journal on April 23, May 13, and May 25, 2009. The public hearing itself took place on May 28, 2009 by the Washoe County District Board of Health in Reno, Nevada. No comments were made by members of the public at the hearing.

Enclosure

Transportation Conformity Adequacy Review

Control Strategy State Implementation Plan (SIP) Under Review: Redesignation Request and Maintenance Plan for the Truckee Meadows 24-Hour PM10 Nonattainment Area		Date of SIP Revision Receipt by EPA: 07/13/09	
Reviewers: Eleanor Kaplan		Date: 04/27/10	
Transportation Review Criteria		Is Criterion Satisfied? Y/N	Reference in SIP Document/Comments
Sec. 3.118(e)(4)(i)	The plan was endorsed by the Governor (or designee) and was subject to a public hearing.	Y	The Truckee Meadows PM ₁₀ Maintenance Plan was submitted to EPA on July 13, 2009 by the Administrator of the Nevada Division of Environmental Protection (NDEP), the Governor of Nevada's designee for all SIP revision submittals. This SIP submittal documents that the Washoe County District Board of Health, which is responsible for implementation of air quality management programs within the boundaries of Washoe County, which includes Truckee Meadows, held a public hearing on the plan on May 28, 2009, and adopted the plan on that same date.
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 plan was developed with consultation from Federal, State, and local agencies. These agencies include: EPA Region IX; Federal Highway Administration; Nevada Department of Transportation; Nevada Division of Environmental Protection, Bureau of Air Quality Planning; Regional Transportation Commission of Washoe County; Public Works Departments of Washoe County, City of Reno, City of Sparks; and Associated General Contractors. Issues raised by EPA Region IX staff on the administrative draft were addressed through this process prior to publication of the proposed plan for public review.
Sec. 93.118(e)(4)(iii)	The motor vehicle emission budget(s) is clearly identified and precisely quantified.	Y	The motor vehicle emissions budgets are clearly identified and precisely quantified for years 2009, 2013, 2018, and 2020 on page 29 of the Truckee Meadows PM ₁₀ Maintenance Plan.
Sec. 93.118(e)(4)(iv)	The motor vehicle emissions budget(s), when considered together with all other emission sources, is consistent with applicable	Y	The Truckee Meadows PM ₁₀ Maintenance Plan describes how the level of emissions contained in the motor vehicle emission budgets, which include identified safety margins, are consistent, when considered with all other emissions sources, with maintenance of the PM ₁₀ NAAQS through year 2020. See pages 28



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DATE		4/30/10	4-30-10	4-30-10	4-30		

U.S. EPA CONCURRENCES OFFICIAL FILE COPY

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