



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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Seattle, WA 98101-3140

APR 24 2017

OFFICE OF  
AIR AND WASTE

Mr. Richard Whitman  
Director  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, Oregon 97204-1390

Re: Adequacy Finding for the Oakridge-Westfir PM<sub>2.5</sub> Attainment State Implementation Plan

Dear Mr. Whitman:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's adequacy finding for transportation conformity purposes of the motor vehicle emissions budget in the *Oakridge-Westfir PM<sub>2.5</sub> Attainment Plan* for the 2006 PM<sub>2.5</sub> national ambient air quality standard. As a result of our adequacy finding, the Oregon Department of Environmental Quality, Oregon Department of Transportation, and the U.S. Department of Transportation are required to utilize this budget for purposes of regional emissions analysis for conformity.

The SIP was submitted to the EPA on January 20, 2017. We announced receipt of the state implementation plan (SIP) on the EPA's Office of Transportation and Air Quality web site on February 7, 2017, and requested public comment on the on-road portion of the attainment demonstration in the SIP by no later than March 9, 2017. We received no comments during the comment period.

Pursuant to 40 CFR 93.118(e)(4) of the Transportation Conformity Rule (40 CFR part 93, subpart A), the EPA reviewed the submitted SIP and the motor vehicle emissions budget contained in the SIP, which were developed with the use of the Motor Vehicle Emissions Simulator on-road model. The EPA determined that the motor vehicle emissions budget is adequate for transportation conformity purposes. In reaching this decision, we have reviewed the SIP, including supplemental material provided by the state of Oregon. We received no adverse comment regarding the state's approach to on-road emissions during the comment period. Based on our review, we believe it is appropriate to find the motor vehicle emission budget contained therein adequate for transportation conformity purposes while the EPA continues to review the other aspects of the SIP. This adequacy finding does not relate to the merits of the SIP submittal nor does it indicate whether the submittal meets the requirements for approval. The adequate budget is listed in the following table.

2015 Motor Vehicle Emissions Budget for Oakridge-Westfir	
Primary PM <sub>2.5</sub> - Total	22.2 lbs/day

We have determined that the motor vehicle emission budgets contained in the SIP, when considered with all other emissions sources in the Oakridge-Westfir area, are consistent with applicable

requirements for attaining the 2006 annual PM<sub>2.5</sub> national ambient air quality standard. The motor vehicle emissions budget also meets the other adequacy criteria found in 40 CFR 93.118(e)(4)(iv) as detailed in the enclosed "Transportation Conformity Adequacy Review." This motor vehicle emissions budget serves to strengthen the SIP through continued progress toward attainment and ensure that the motor vehicle emissions remain consistent with the emissions levels provided for in the SIP.

A copy of this letter and its enclosure will be posted on the Internet.<sup>1</sup> The EPA's adequacy finding for purposes of transportation conformity is not dispositive of the EPA's ultimate approval or disapproval of the SIP.

The EPA intends to publish a notice of this adequacy determination in the *Federal Register* and the determination will become effective 15 days after the *Federal Register* publication. If you have any questions, please contact Karl Pepple of my staff at (206) 553-1778 or [pepple.karl@epa.gov](mailto:pepple.karl@epa.gov).

Sincerely,



Tim Hamlin, Director  
Office of Air and Waste

Enclosure

cc: Ms. Jasmin Harris  
Federal Highway Administration

Ms. Michelle Eraut  
Federal Highway Administration

Mr. Ned Conroy  
Federal Transit Administration

Mr. David Collier  
Oregon Department of Environmental  
Quality

Ms. Natalie Liljenwall  
Oregon Department of Transportation

Ms. Carole Newvine  
Oregon Department of Transportation

Mr. Dave Nordberg  
Oregon Department of Environmental  
Quality

Mr. Merlyn Hough  
Lane Regional Air Protection Agency

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<sup>1</sup> <https://www.epa.gov/state-and-local-transportation/state-implementation-plans-sip-submissions-epa-has-found-adequate-or>

**Enclosure to Letter Dated April XX, 2017 from Tim Hamlin to Richard Whitman**  
 Transportation Conformity Adequacy Review

*The Oakridge-Westfir PM<sub>2.5</sub> Attainment Plan*  
 Submitted January 20, 2017

**Adequacy Determination of Motor Vehicle Emissions Budget 40 CFR 93.118 (e) (4)**

(4) EPA will not find a motor vehicle emissions budget in a submitted control strategy implementation plan revision or maintenance plan to be adequate for transportation conformity purposes unless the following minimum criteria are satisfied:

<i>Adequacy Review Criteria</i>	<i>Is this Criterion Satisfied?</i>	<i>Reference in SIP Documents/Comments</i>
(i) The submitted control strategy implementation plan revision or maintenance plan was endorsed by the Governor (or his or her designee) and was subject to a State public hearing;	Yes	This plan was filed by the Governor of Oregon’s designee, Leah Feldon, Deputy Director of the Oregon Department of Environmental Quality (ODEQ), on January 20, 2017. The plan was the subject of a public hearing held in Springfield, OR on November 10, 2016. The details of the hearing can be located in the “Oakridge SIP cover letter and admin mtl’s dated 1.20.17.pdf” document supplied by ODEQ.
(ii) Before the control strategy implementation plan or maintenance plan was submitted to EPA, consultation among federal, State, and local agencies occurred; full implementation plan documentation was provided to EPA; and EPA’s stated concerns, if any, were addressed;	Yes	A draft of the Oakridge-Westfir PM <sub>2.5</sub> Attainment Plan and supporting documentation was reviewed by EPA Region 10 and discussed with state and local agencies, including the Lane Regional Air Protection Agency (LRAPA), prior to state adoption by ODEQ on January 18 16, 2017. In addition, informal consultations between EPA, ODEQ, LRAPA, and other agencies were held as the draft plan was being developed. EPA concerns were addressed during this consultation process.
(iii) The motor vehicle emissions budget(s) is clearly identified and precisely quantified;	Yes	Appendix 4 of the Oakridge-Westfir PM <sub>2.5</sub> Attainment Plan clearly lists the motor vehicle emissions budget (MVEB) for a “worst case day” (in pounds per day). An MVEB is set only for primary emissions of PM <sub>2.5</sub> , as secondary formation of PM <sub>2.5</sub> is not a factor in the area.
(iv) The motor vehicle emissions budget(s), when considered together with all other emissions sources, is consistent with applicable requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given implementation plan submission);	Yes	Taken as a whole, the MVEB is consistent with the SIP for bringing the area to attainment. The main reason this area is nonattainment is due to residential wood smoke. On-road emissions from vehicles are decreasing due to federal engine and fuel standards. The MVEB reflects those federal rules.

<p>(v) The motor vehicle emissions budget(s) is consistent with and clearly related to the emissions inventory and the control measures in the submitted control strategy implementation plan revision or maintenance plan; and</p>	<p>Yes</p>	<p>The PM<sub>2.5</sub> issue faced in Oakridge-Westfir is dominated by the area source sector (residential wood stoves). The MVEB is in line with the emissions inventory, and with the control strategies developed. While the SIP contains contingency measures, none are for on road sources.</p>
<p>(vi) Revisions to previously submitted control strategy implementation plans or maintenance plans 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).</p>	<p>Yes</p>	<p>The appendices to this submittal provide an update to modeling that was conducted for a 2012 submittal to the EPA for the Oakridge-Westfir area. The 2012 submittal was partially approved and partially disapproved by the EPA. (See 81 FR 72714).</p>
<p>93.118 (e) (5) Before determining the adequacy of a submitted motor vehicle emissions budget, EPA will review the State's compilation of public comments and response to comments that are required to be submitted with any implementation plan. EPA will document its consideration of such comments and responses in a letter to the State indicating the adequacy of the submitted motor vehicle emissions budget.</p>	<p>Yes</p>	<p>The State supplied proof of public notices and a public hearing. ODEQ received no comments on this SIP.</p>