Baltimore, MD and Washington, DC-MD-VA Nonattainment Areas

Final Area Designations for the 2015 Ozone National Ambient Air Quality Standards Technical Support Document (TSD)

1.0 Summary

This technical support document (TSD) describes EPA's final designations of nonattainment for the Baltimore, MD and Washington, DC-MD-VA areas for the 2015 ozone national ambient air quality standards (NAAQS). As described in this document, the Baltimore, MD nonattainment area is located solely within Maryland, while the Washington, DC-MD-VA nonattainment area is comprised of portions of Virginia (VA), Maryland (MD), and the District of Columbia (DC). EPA's nonattainment designation with respect to Cecil County, MD is contained in a separate TSD for the Philadelphia Area.

On October 1, 2015, EPA promulgated revised primary and secondary ozone NAAQS (80 FR 65292; October 26, 2015). EPA strengthened both standards to a level of 0.070 parts per million (ppm). In accordance with Section 107(d) of the Clean Air Act (CAA), whenever EPA establishes a new or revised NAAQS, EPA must promulgate designations for all areas of the country for that NAAQS.

Under section 107(d), states were required to submit area designation recommendations to EPA for the 2015 ozone NAAQS no later than 1 year following promulgation of the standards, i.e., by October 1, 2016. Tribes were also invited to submit area designation recommendations. On September 23, 2016, the District of Columbia recommended that the entire District be designated as nonattainment for the 2015 ozone NAAQS. The Commonwealth of Virginia recommended on October 3, 2016 that the counties and cities identified in the second column of Table 1, below, be designated as nonattainment for the 2015 ozone NAAQS. Both the District of Columbia and Virginia based their recommendations on certified 2013-2015 air quality data. In a letter dated March 23, 2017, the State of Maryland submitted its designation recommendations for all areas within the State for the 2015 ozone NAAQS. For the Baltimore, MD and Washington, DC-MD-VA areas, Maryland recommended that the city and counties identified in the second column of Table 1 be designated as nonattainment based on 2014-2016 preliminary data. Based on certified 2014-2016 air quality data, West Virginia recommended to EPA on September 7, 2017 that the entire State be designated as unclassifiable/attainment for the 2015 ozone NAAQS.

After considering these recommendations, and based on EPA's technical analysis as described in this TSD, EPA concurs and is designating the areas in Table 1 as nonattainment for the 2015 ozone NAAQS. EPA must designate an area nonattainment if it has an air quality monitor that is violating the standard or if it has sources of emissions that are contributing to a violation of the NAAQS in a nearby area. Detailed descriptions of the nonattainment boundaries for these areas are found in the supporting technical analysis for each area in Section 3.

Table 1. State Recommended Nonattainment Areas and EPA's Final Designated Nonattainment Areas for the 2015 Ozone NAAQS

| Area | State/Commonwealth's Recommended Nonattainment Counties and Cities | EPA's Final Nonattainment Counties and Cities |
|---------------|--|--|
| Baltimore, MD | Anne Arundel, Baltimore, Carroll, | Anne Arundel, Baltimore, Carroll, |
| | Harford, and Howard Counties, | Harford, and Howard Counties, and |
| | and the City of Baltimore | the City of Baltimore |

| Washington, DC-MD-VA (DC) | The District of Columbia | The District of Columbia |
|---------------------------|--|--|
| Washington, DC-MD-VA (MD) | Calvert, Charles, Frederick, Montgomery, and Prince George's Counties | Calvert, Charles, Frederick, Montgomery, and Prince George's Counties |
| Washington, DC-MD-VA (VA) | Arlington, Fairfax, Loudoun, and Prince William Counties, and the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park | Arlington, Fairfax, Loudoun, and Prince William Counties, and the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park |

Please note that the Washington, DC-MD-VA area is a multi-state area including the District of Columbia and certain counties and cities in Maryland and Virginia.

For Virginia, EPA is designating the remainder of the Commonwealth as attainment/unclassifiable based on 2014-2016 design values showing compliance with the 2015 ozone NAAQS, and EPA's assessment that these areas are not contributing to a violation in a nearby area. There is an additional TSD (Philadelphia-Wilmington-Atlantic City) that includes an analysis of a portion of Maryland, specifically Cecil County. Cecil County, Maryland is being designated nonattainment as part of the Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD nonattainment area. Outside of what EPA has determined to be nonattainment in this TSD and in the Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD TSD, the Agency is designating the remainder of the State of Maryland as attainment/classifiable based on 2014-2016 design values showing compliance with the 2015 ozone NAAQS, and EPA's assessment that these areas are not contributing to a violation in a nearby area.

2.0 Nonattainment Area Analyses and Boundary Determinations

EPA evaluated and determined the boundaries for each nonattainment area on a case-by-case basis, considering the specific facts and circumstances of the area. In accordance with CAA section 107(d), EPA is designating as nonattainment the areas with monitors that are violating the 2015 ozone NAAQS, as well as any nearby areas with emissions sources (i.e., stationary, mobile, and/or area sources) that contribute to the violations. As described in EPA's designations guidance for the 2015 NAAQS (hereafter referred to as the "ozone designations guidance"), after identifying each monitor indicating a violation of the ozone NAAQS in an area, EPA analyzed those nearby areas with emissions potentially contributing to the violating area. In the ozone designations guidance, EPA stated that using the Core Based Statistical Area (CBSA) or Combined Statistical Area (CSA)² as a starting point for the contribution analysis is a reasonable approach to ensure that the nearby areas most likely to contribute to a violating area are evaluated. The area-specific analyses may support nonattainment area boundaries that are smaller or larger than the CBSA or CSA.

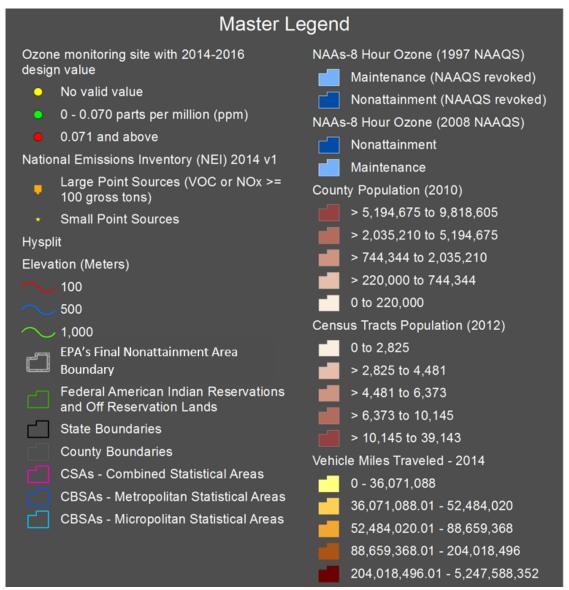
¹ EPA issued guidance on February 25, 2016 that identified important factors that the Agency used to determine appropriate area designations and nonattainment boundaries for the 2015 ozone NAAQS. Available at https://www.epa.gov/ozone-designations/epa-guidance-area-designations-2015-ozone-naaqs

² Lists of CBSAs and CSAs and their geographic components are provided at www.census.gov/population/www/metroareas/metrodef.html. The Office of Management and Budget (OMB) adopts standards for defining statistical areas. The statistical areas are delineated based on U.S. Census Bureau data. The lists are periodically updated by the OMB. EPA used the most recent July 2015 update (OMB Bulletin No. 15-01), which is based on application of the 2010 OMB standards to the 2010 Census, 2006-2010 American Community Survey, as well as 2013 Population Estimates Program data.

On November 6, 2017, EPA issued attainment/unclassifiable designations for approximately 85% of the United States and one unclassifiable area designation.³ At that time, consistent with statements in the designations guidance regarding the scope of the area EPA would analyze in determining nonattainment boundaries, EPA deferred designation for any counties in the larger of a CSA or CBSA where one or more counties in the CSA or CBSA was violating the standard, as well as any counties with a violating monitor not located in a CSA or CBSA. In addition, EPA deferred designation for any other counties adjacent to a county with a violating monitor. EPA also deferred designation for any county that had incomplete monitoring data, any county in the larger of the CSA or CBSA where such a county was located, and any county located adjacent to a county with incomplete monitoring data.

EPA completed analysis of the deferred designations consistent with the designations guidance (and EPA's past practice) regarding the scope of the area EPA would analyze in determining nonattainment boundaries for the ozone NAAQS, as outlined above. For those deferred areas with one or more counties violating the ozone NAAQS, or with incomplete data, that are located in a CSA or CBSA, the technical analysis (in most cases) for the nonattainment area starts with any counties in the larger of the relevant CSA or CBSA. For counties with a violating monitor that are not located in a CSA or CBSA, EPA explains, in the 3.0 Technical Analysis section, whether to consider in the five-factor analysis for each area any other adjacent counties for which EPA previously deferred action. EPA is designating all counties not included in a five-factor analysis for a specific nonattainment or unclassifiable area analysis, as attainment/unclassifiable. These deferred areas are identified in a separate document entitled "Designations for Deferred Counties and County Equivalents Not Addressed in the Technical Analyses," which is available in the docket.

³ Air Quality Designations for the 2015 Ozone National Ambient Air Quality Standards, 82 FR 54232 (Nov. 16, 2017).



Figures in the remainder of this document refer to the master legend, above.

Figure 1a is a map of EPA's nonattainment boundary for the Baltimore, MD nonattainment area for the 2015 ozone NAAQS. The map shows the location of the ambient air quality monitors, along with county and other jurisdictional boundaries. For purposes of the 1997 and 2008 ozone NAAQS, the Baltimore-Columbia-Towson, MD CBSA, excluding Queen Anne's County, was designated nonattainment. The boundary for the nonattainment area for both the 1997 and 2008 ozone NAAQS included Baltimore City and the entire counties of Anne Arundel, Baltimore, Carroll, Harford, and Howard in Maryland. The boundary for the Baltimore, MD area for the 2015 ozone NAAQS is the same as the boundaries for the 1997 and the 2008 ozone NAAQS.

Figure 1b is a map of EPA's nonattainment boundary for the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS. The map shows the location of the ambient air quality monitors, county, and other jurisdictional boundaries. For purposes of the 1997 and 2008 ozone NAAQS, the nonattainment area included the District of Columbia and the entire counties of Calvert, Charles, Frederick, Montgomery, and Prince George's in Maryland and Arlington, Fairfax, Loudoun, and Prince William in Virginia. The 1997 and 2008 ozone NAAQS nonattainment area also included the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park. The boundary for the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS is the same as the boundaries for the 1997 and 2008 ozone NAAQS.

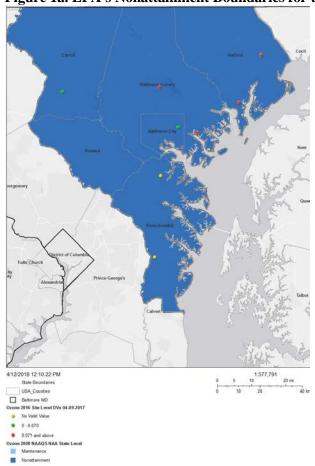
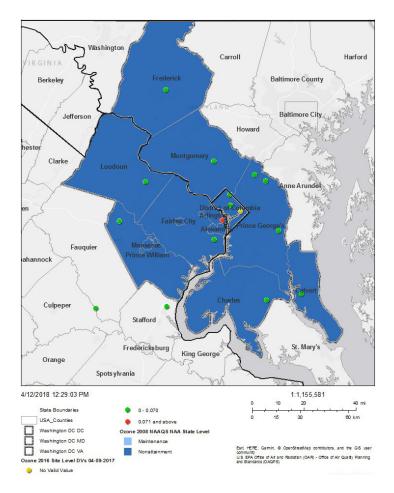


Figure 1a. EPA's Nonattainment Boundaries for the Baltimore, MD Area.

Figure 1b. EPA's Nonattainment Boundaries for the Washington, DC-MD-VA Area.



EPA must designate as nonattainment any area that violates the NAAQS and any nearby areas that contribute to the violation in the violating area.

Baltimore and Harford Counties have monitors in violation of the 2015 ozone NAAQS; therefore these counties are included in the Baltimore, MD nonattainment area. As detailed in the analysis that follows, EPA has also determined that Anne Arundel, Carroll, and Howard Counties as well as Baltimore City contribute to the violating monitors in Baltimore and Harford Counties in the Baltimore area.

Arlington County, VA has a monitor in violation of the 2015 ozone NAAQS, therefore this county is included in the final Washington, DC-MD-VA nonattainment area. EPA has also determined that the District of Columbia as well as the following Maryland and Virginia counties contribute to the violating monitor in Arlington County, VA in the Washington, DC-MD-VA area: Prince George's, Calvert, Charles, Frederick, Fairfax, Loudoun, and Prince William. In addition, EPA determined that the following Virginia cities also contribute to the violating area: Fairfax, Falls Church, Manassas, and Manassas Park.

3.0 The Washington, DC-MD-VA and Baltimore, MD Areas

The Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA encompasses what has previously been designated as two separate nonattainment areas: the Washington, DC-MD-VA nonattainment area, and the Baltimore, MD nonattainment area.

The area of analysis for this technical support document is the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA, which includes several CBSAs in Maryland, Virginia, West Virginia (WV), Pennsylvania (PA), and the District of Columbia.

The Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA includes the District of Columbia as well as Calvert, Charles, Frederick, Montgomery, and Prince George's Counties in Maryland and Hampshire and Jefferson Counties in West Virginia. The Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA also includes Arlington, Clarke, Culpeper, Fairfax, Fauquier, Frederick, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren Counties, and Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, Manassas Park, and Winchester Cities in Virginia.

The Baltimore-Columbia-Towson, MD CBSA includes Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's Counties as well as Baltimore City in Maryland.

The remaining counties in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA are single county CBSAs with the exception of Berkeley County and Washington County. These remaining counties and their associated CBSAs are as follows: Berkeley County, WV and Washington County, MD are in the Hagerstown-Martinsburg, MD-WV CBSA, Franklin County, PA is in the Chambersburg-Waynesboro, PA CBSA, Dorchester County, MD is the Cambridge, MD CBSA, St. Mary's County, MD is the California-Lexington Park, MD CBSA and Talbot County, MD is the Easton, MD CBSA.

Table 2 provides a list of all the jurisdictions within the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA and each jurisdiction's corresponding CBSA.

Table 2. CBSAs and Counties within the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA.

| County/City, State | CBSA |
|-------------------------|--|
| District of Columbia | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Calvert, MD | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Charles, MD | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Prince George's, MD | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Arlington, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Clarke, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Culpeper, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Fairfax, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Fauquier, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Frederick, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Loudoun, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Prince William, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Rappahannock, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Spotsylvania, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Stafford, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Warren, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Alexandria City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Fairfax City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Falls Church City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Fredericksburg City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Manassas City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Manassas Park City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Winchester City, VA | Washington-Arlington-Alexandria, DC-VA-MD-WV |

| ** 11 **** | *** 11 |
|--------------------|--|
| Hampshire, WV | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Jefferson, WV | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Frederick, MD | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Montgomery, MD | Washington-Arlington-Alexandria, DC-VA-MD-WV |
| Anne Arundel, MD | Baltimore-Columbia-Towson, MD |
| Baltimore, MD | Baltimore-Columbia-Towson, MD |
| Carroll, MD | Baltimore-Columbia-Towson, MD |
| Harford, MD | Baltimore-Columbia-Towson, MD |
| Howard, MD | Baltimore-Columbia-Towson, MD |
| Queen Anne's, MD | Baltimore-Columbia-Towson, MD |
| Baltimore City, MD | Baltimore-Columbia-Towson, MD |
| Washington, MD | Hagerstown-Martinsburg, MD-WV |
| Berkeley, WV | Hagerstown-Martinsburg, MD-WV |
| Franklin, PA | Chambersburg-Waynesboro, PA |
| Dorchester, MD | Cambridge, MD |
| St. Mary's, MD | California-Lexington Park, MD |
| Talbot, MD | Easton, MD |

Grouping of Areas for Analysis:

Because the Washington-Baltimore-Arlington CSA is made up of 40 cities and counties, the area of analysis will be discussed using the subcomponents identified below to simplify the analysis. These subcomponent groupings are consistent with the multiple CBSAs that comprise the Washington-Baltimore-Arlington CSA, with the recommendations submitted by the states and the District of Columbia, and with the manner in which the area has been considered and designated for previous ozone NAAQS:

- (1) The Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA includes the District of Columbia as well as Calvert, Charles, Frederick, Montgomery, and Prince George's Counties in Maryland and Hampshire and Jefferson Counties in West Virginia. It also includes Arlington, Clarke, Culpeper, Fairfax, Fauquier, Frederick, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren Counties and Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, Manassas Park, and Winchester Cities in Virginia.
- (2) The Baltimore-Columbia-Towson, MD CBSA includes Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's Counties as well as Baltimore City in Maryland.
- (3) Remaining: Berkeley County, WV and Washington, MD (of the Hagerstown-Martinsburg, MD-WV CBSA), Franklin County, PA (of the Chambersburg-Waynesboro, PA CBSA), Dorchester County, MD (of the Cambridge, MD CBSA), St. Mary's County, MD (of the California-Lexington Park, MD CBSA) and Talbot County, MD (of the Easton, MD CBSA.)

3.1 Technical Analyses for the Nonattainment Areas

The technical analysis first identifies the areas with a monitor that violates the 2015 ozone NAAQS. EPA then evaluates this area and any nearby areas to determine whether those nearby areas have emissions sources that contribute to ambient ozone concentrations in the violating area, based on the weight-of-evidence of the five factors recommended in EPA's ozone designations guidance, as well as any other relevant information. In developing this technical analysis, EPA used the latest data and information available to EPA (and to the states

and tribes through the Ozone Designations Mapping Tool and EPA Ozone Designations Guidance and Data web page).⁴ In addition, EPA considered any additional data or information provided to EPA by states or tribes.

The five factors recommended in EPA's guidance are:

- (1) Air Quality Data (including the design value calculated for each Federal Reference Method (FRM) or Federal Equivalent Method (FEM) monitor;
- (2) Emissions and Emissions-Related Data (including locations of sources, population, amount of emissions, and urban growth patterns);
- (3) Meteorology (weather/transport patterns);
- (4) Geography/Topography (including mountain ranges or other physical features that may influence the fate and transport of emissions and ozone concentrations); and
- (5) Jurisdictional Boundaries (e.g., counties, air districts, existing nonattainment areas, areas of Indian country, Metropolitan Planning Organizations (MPOs)).

The following sections describe the five factor analysis. While the factors are presented individually, they are not independent. The five factor analysis process carefully considers the interconnections among the different factors and the dependence of each factor on one or more of the others, such as the interaction between emissions and meteorology for the area being evaluated.

Factor Assessment

Factor 1: Air Quality Data

EPA considered 8-hour ozone design values in ppm for air quality monitors in the Washington-Baltimore-Arlington CSA area of analysis based on data for the 2014-2016 period (i.e., the 2016 design value, or DV). This is the most recent three-year period with fully-certified air quality data. The design value is the 3-year average of the annual 4th highest daily maximum 8-hour average ozone concentration. ⁵ The 2015 NAAQS are met when the design value is 0.070 ppm or less. Only ozone measurement data collected in accordance with the quality assurance (QA) requirements using approved (FRM/FEM) monitors are used for NAAQS compliance determinations. EPA uses FRM/FEM measurement data residing in EPA's Air Quality System (AQS) database to calculate the ozone design values. Individual violations of the 2015 ozone NAAQS that EPA determines have been caused by an exceptional event that meets the administrative and technical criteria in the Exceptional Events Rule⁷ are not included in these calculations. Whenever several monitors are located in a county (or designated nonattainment area), the design value for the county or area is determined by the monitor with the highest valid design value. The presence of one or more violating monitors (i.e. monitors with design values greater than 0.070 ppm) in a county or other geographic area forms the basis for designating that county or area as nonattainment. The remaining four factors are then used as the technical basis for determining the spatial extent of the designated nonattainment area surrounding the violating monitor(s) based on a consideration of what nearby areas are contributing to a violation of the NAAOS.

EPA identified monitors where the most recent design values violate the NAAQS, and examined historical ozone air quality measurement data (including previous design values) to understand the nature of the ozone

⁴ EPA's Ozone Designations Guidance and Data web page can be found at https://www.epa.gov/ozone-designations/ozone-designations-guidance-and-data.

⁵ The specific methodology for calculating the ozone design values, including computational formulas and data completeness requirements, is described in 40 CFR part 50, appendix U.

⁶ The QA requirements for ozone monitoring data are specified in 40 CFR part 58, appendix A. The performance test requirements for candidate FEMs are provided in 40 CFR part 53, subpart B.

⁷ EPA finalized the rule on the Treatment of Data Influenced by Exceptional Events (81 FR 68513) and the guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events in September of 2016. For more information, see https://www.epa.gov/air-quality-analysis/exceptional-events-rule-and-guidance.

ambient air quality problem in the area. Eligible monitors for providing design value data generally include State and Local Air Monitoring Stations (SLAMS) that are operated in accordance with 40 CFR part 58, appendices A, C, D and E and operating with an FRM or FEM monitor. These requirements must be met in order to be acceptable for comparison to the 2015 ozone NAAQS for designation purposes. All data from Special Purpose Monitors (SPMs) using an FRM or FEM are eligible for comparison to the NAAQS, subject to the requirements given in the March 28, 2016 Revision to Ambient Monitoring Quality Assurance and Other Requirements Rule (81 FR 17248).

The 2014-2016 design values for counties in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA area are shown in Table 3. Monitors located in the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA are in cells shaded in gray. The rows containing monitors located in the Baltimore-Columbia-Towson, MD CBSA are shaded in green. The remaining rows in white are for monitors within other CBSAs located geographically within the CSA.

Exceptional Events

The State of Maryland submitted an Exceptional Events (EE) demonstration for numerous monitors in Maryland, including for the following monitors: Anne Arundel County (240031003), Baltimore City (245100054), Harford County (240251001), and Prince George's County (240338003). EPA concurred on the EE demonstration for the above-mentioned monitors. The updated 2014-2016 design values are in Table 3 below. The Prince George's County monitor (240338003) shows a design value that now meets the 2015 ozone NAAQS.

Table 3. Air Quality Data (all values in ppm)^a.

| County, State | State Recommended Nonattainment | AQS Site ID | 2014- 2016 DV (ppm) | 2014 4th highest daily max value | 2015 4th highest daily max value | 2016 4th highest daily max value |
|-------------------------|---------------------------------------|-------------|------------------------------|---|---|---|
| | | 11-001-0041 | N/A | 0.047 | N/A | 0.065 |
| District of Columbia | Yes | 11-001-0043 | 0.070 | 0.068 | 0.072 | 0.072 |
| | | 11-001-0050 | 0.070 | 0.069 | 0.072 | 0.071 |
| Anna Amardal MD | Vac | 24-003-0014 | N/A | 0.066 | 0.071 | N/A |
| Anne Arundel, MD | Yes | 24-003-1003 | N/A | N/A | N/A | 0.074 |
| | | 24-005-1007 | 0.072 | 0.067 | 0.078 | 0.073 |
| Baltimore, MD | Yes | 24-005-3001 | 0.072 | 0.068 | 0.072 | 0.078 |
| | | 24-005-3474 | N/A | N/A | N/A | 0.088 |
| Baltimore (City), MD | Yes | 24-510-0054 | 0.066 ^b | 0.060 | 0.072 | 0.067 |
| Calvert, MD | Yes | 24-009-0011 | 0.069 | 0.070 | 0.067 | 0.070 |
| Carroll, MD | Yes | 24-013-0001 | 0.068 | 0.064 | 0.070 | 0.072 |
| Charles, MD | Yes | 24-017-0010 | 0.070 | 0.070 | 0.068 | 0.073 |
| Danahaatan MD | No | 24-019-0004 | 0.064 | 0.065 | 0.061 | 0.067 |
| Dorchester, MD | | 24-019-9991 | 0.066 | 0.065 | 0.065 | 0.068 |
| Frederick, MD | Yes | 24-021-0037 | 0.067 | 0.063 | 0.070 | 0.070 |
| Hanfand MD | Yes | 24-025-1001 | 0.072 b | 0.067 | 0.074 | 0.077 |
| Harford, MD | | 24-025-9001 | 0.073 | 0.070 | 0.073 | 0.077 |
| Howard, MD | Yes | No monitor | | | N/A | |
| Montgomery, MD | Yes | 24-031-3001 | 0.068 | 0.064 | 0.072 | 0.068 |
| | | 24-033-0030 | 0.069 | 0.065 | 0.072 | 0.070 |
| Prince George's, MD | Yes | 24-033-8003 | 0.070 b | 0.069 | 0.069 | 0.073 |
| | | 24-033-9991 | 0.068 | 0.069 | 0.067 | 0.070 |
| Queen Anne's, MD | No | No monitor | | | N/A | |
| St. Mary's, MD | No | No monitor | | | N/A | |
| Talbot, MD | No | No monitor | | | N/A | |
| Washington, MD | No | 24-043-0009 | 0.066 | 0.061 | 0.067 | 0.070 |
| Franklin, PA | No | 42-055-0001 | 0.060 | 0.063 | 0.059 | 0.059 |
| Alexandria (City), VA | Yes | No monitor | | | N/A | |
| Arlington, VA | Yes | 51-013-0020 | 0.072 | 0.071 | 0.073 | 0.072 |
| Clarke, VA | No | No monitor | N/A | | | |
| Culpeper, VA | No | No monitor | N/A | | | |
| Fairfax, VA | Yes | 51-059-0030 | 0.070 | 0.065 | 0.072 | 0.073 |
| Fairfax (City), VA | Yes | No monitor | N/A | | | |
| Falls Church (City), VA | Yes | No monitor | N/A | | | |
| Fauquier, VA | No | 51-061-0002 | 0.059 | 0.059 | 0.056 | 0.063 |

| Frederick, VA | No | 51-069-0010 | 0.061 | 0.059 | 0.061 | 0.065 |
|-----------------------------|-----|-------------|-------|-------|-------|-------|
| Frederick (City), VA | No | No monitor | | | N/A | |
| Loudoun, VA | Yes | 51-107-1005 | 0.067 | 0.063 | 0.071 | 0.068 |
| Manassas (City), VA | Yes | No monitor | | | N/A | |
| Manassas Park (City), VA | Yes | No monitor | N/A | | | |
| Prince William, VA | Yes | 51-153-0009 | 0.065 | 0.062 | 0.067 | 0.067 |
| Rappahannock, VA | No | No monitor | N/A | | | |
| Spotsylvania, VA | No | No monitor | | | N/A | |
| Stafford, VA | No | 51-179-0001 | 0.063 | 0.062 | 0.063 | 0.066 |
| Warren, VA | No | No monitor | | | N/A | |
| Winchester (City), VA | No | No monitor | N/A | | | |
| Jefferson, WV | No | No monitor | N/A | | | |
| Berkeley, WV | No | 54-003-0003 | 0.063 | 0.060 | 0.066 | 0.064 |
| Hampshire, WV | No | No monitor | N/A | | | |

^a The highest design value in each county is indicated in bold type.

N/A indicates that the monitor did not meet the completeness criteria described in 40 CFR, part 50, appendix U, or that no data exists for that county.

The violating monitors within the Baltimore-Columbia-Towson, MD CBSA are located within two counties. Violating monitors 240051007 and 240053001 are located within Baltimore County in Padonia, MD and Essex, MD, respectively. A third monitor located within Baltimore County, Maryland, 240053474, only had complete data for 2016 and three years of complete data are required in order to determine a complete design value at any one monitor. Violating monitors 240251001 and 240259001 are located within Harford County in Edgewood, MD and Churchville, MD, respectively. There are two monitors located in the Baltimore-Columbia-Towson, MD CBSA that are attaining the 2008 ozone NAAQS based on the 2014-2016 design values and three monitors in the CBSA (two in Anne Arundel, MD and one in Baltimore, MD) which do not have enough valid data to determine a design value.

There is one violating monitor within the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA which is located in Arlington County, Virginia (monitor 510130020). There are 15 monitors within the CBSA that are attaining the 2015 ozone NAAQS based on the 2014-2016 design values and one monitor located in the District of Columbia which does not have enough valid data to determine a design value.

There are five counties that contain monitors which are within the Washington-Baltimore-Arlington CSA, yet are outside of both the Washington-Arlington-Alexandria CBSA and the Baltimore-Columbia-Towson CBSA. All five of these monitors are attaining the 2015 ozone NAAQS based on the 2014-2016 design values.

Table 3 identifies the design values for all monitors in the area of analysis and Figure 2 shows the historical trend of design values for the violating monitors within the CSA. There are four violating monitors that are located within the Baltimore-Columbia-Towson, MD CBSA and one violating monitor located within the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA. Baltimore, MD monitors 240051007 and

^b By letters and enclosures dated May 26, 2017 and October 20, 2017, Maryland submitted an EE demonstration related to the May and July 2016 Canadian wildfires. By letter dated December 26, 2017, EPA concurred on 17 monitor days, including the following monitors associated with the Washington-Baltimore-Arlington CSA: Baltimore City, MD (245100054); Harford, MD (240251001); and Prince George's, MD (240338003). The design values have been updated accordingly. Note that the design value change at monitor 24-033-8003 in Prince George's County, MD indicates that the monitor is no longer in violation.

240053001 as well as Harford, MD monitors 240251001 and 240259001 are located within the Baltimore CBSA. The Arlington, VA monitor 510130020 is located within the Washington CBSA.

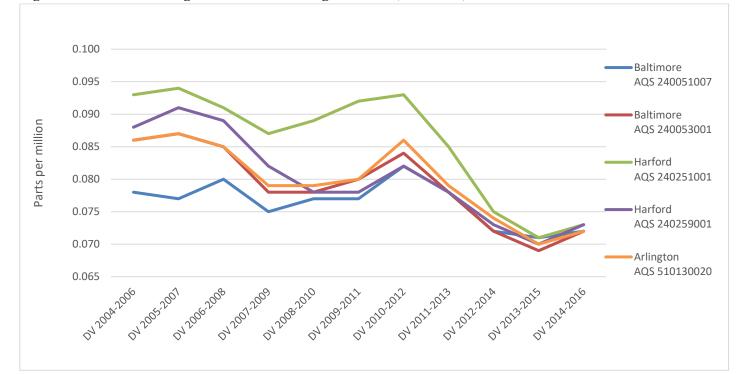


Figure 2. Three-Year Design Values for Violating Monitors (2007-2016).

As shown in Figure 2, every monitor in the CSA had steep decreases in design value measurements between 2012 and 2015. Universally, these monitors also display an uptick between 2015 and 2016 measurements.

Factor 2: Emissions and Emissions-Related Data

EPA evaluated ozone precursor emissions of nitrogen oxides (NO_x) and volatile organic compounds (VOC) and other emissions-related data that provide information on areas contributing to violating monitors.

Emissions Data

EPA reviewed NO_x and VOC emission data from the 2014 National Emissions Inventory (NEI), the most recent NEI data available at the time of the analysis. For each county in the area of analysis, EPA examined the number of large sources (NO_x or VOC emissions greater than 100 tons per year) and small point sources and the magnitude of county-level emissions reported in the NEI. These county-level emissions represent the sum of emissions from the following general source categories: Point sources, non-point (i.e., area) sources, non-road mobile, on-road mobile, and fires. Emissions levels from sources in a nearby area indicate the potential for the area to contribute to monitored violations.

Table 3a provides a county-level emissions summary of NO_x and VOC (given in tons per year (tpy)) emissions for the area of analysis, the Washington-Baltimore-Arlington CSA. Counties located in the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA are in cells shaded in gray. Counties located in the Baltimore-Columbia-Towson, MD CBSA are shaded in green. The remaining counties in white are located within other CBSAs of the CSA. Table 3b provides the total NO_x and VOC emissions separated into three main categories, the Washington-Arlington-Alexandria CBSA, the Baltimore-Columbia-Towson CBSA and a grouping of all the remaining counties in the CSA which are not included in either of the previously mentioned CBSAs.

Table 3a. Total County-Level NO_x and VOC Emissions. ^a

| County, State | State Recommended Nonattainment? | Total NO _x (tpy) | Total VOC (tpy) |
|-------------------------|----------------------------------|-----------------------------|-----------------|
| District of Columbia | Yes | 7,791 | 7,729 |
| Anne Arundel, MD | Yes | 16,850 | 10,946 |
| Baltimore, MD | Yes | 17,557 | 11,828 |
| Baltimore City, MD | Yes | 9,586 | 7,885 |
| Calvert, MD | Yes | 1,635 | 1,817 |
| Carroll, MD | Yes | 5,534 | 3,420 |
| Charles, MD | Yes | 3,723 | 3,286 |
| Dorchester, MD | No | 1,502 | 8,893 |
| Frederick, MD | Yes | 5,686 | 5,158 |
| Harford, MD | Yes | 5,433 | 5,442 |
| Howard, MD | Yes | 6,698 | 5,590 |
| Montgomery, MD | Yes | 16,420 | 16,638 |
| Prince George's, MD | Yes | 18,988 | 13,738 |
| Queen Anne's, MD | No | 1,926 | 1,781 |
| St. Mary's, MD | No | 3,852 | 3,790 |
| Talbot, MD | No | 1,711 | 2,263 |
| Washington, MD | No | 6,783 | 3,902 |
| Franklin, PA | No | 5,045 | 4,778 |
| Alexandria City, VA | Yes | 1,146 | 1,870 |
| Arlington, VA | Yes | 3,691 | 2,807 |
| Clarke, VA | No | 702 | 588 |
| Culpeper, VA | No | 1,420 | 1,430 |
| Fairfax City, VA | Yes | 264 | 606 |
| Fairfax, VA | Yes | 15,177 | 16,051 |
| Falls Church City, VA | Yes | 107 | 274 |
| Fauquier, VA | No | 3,273 | 2,310 |
| Frederick, VA | No | 4,119 | 4,308 |
| Fredericksburg City, VA | No | 859 | 706 |
| Loudoun, VA | Yes | 6,230 | 6,586 |
| Manassas City, VA | Yes | 405 | 618 |
| Manassas Park City, VA | Yes | 85 | 263 |
| Prince William, VA | Yes | 6,624 | 6,724 |
| Rappahannock, VA | No | 215 | 1,777 |
| Spotsylvania, VA | No | 3,300 | 1,162 |
| Stafford, VA | No | 3,757 | 788 |
| Warren, VA | No | 1,394 | 1,271 |
| Winchester City, VA | No | 424 | 798 |
| Berkeley, WV | No | 4,280 | 3,937 |
| Hampshire, WV | No | 828 | 1,977 |
| Jefferson, WV | No | 1,601 | 1,421 |
| | Total | 196,621 | 177,156 |

^a Total emission levels do not include biogenic sources.

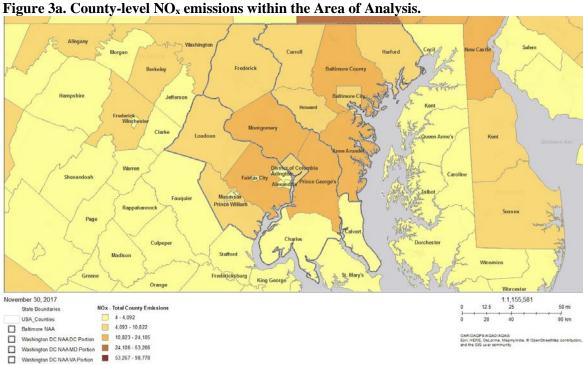
Table 3b. CSA NO_x and VOC Emissions.

| Area | Total NO _x (tpy) | Total VOC (tpy) |
|--|-----------------------------|-----------------|
| Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA (including the following jurisdictions: DC, Calvert, Charles, Frederick, Montgomery, and Prince George's Counties in Maryland; Hampshire and | | |
| Jefferson Counties in West Virginia; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Frederick, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren Counties in Virginia; and Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, Manassas Park, and Winchester Cities in Virginia. | 109,864 | 102,701 |
| Baltimore-Columbia-Towson, MD CBSA (including the following jurisdictions: Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's Counties as well as Baltimore City in Maryland. | 63,584 | 46,892 |
| Remaining Areas of Washington-Baltimore-Arlington CSA which are not included in the above two CBSAs. (including the following jurisdictions: Dorchester, Talbot, Washington, and St. Mary's Counties in Maryland; Berkeley County in West Virginia; and Franklin County in Pennsylvania. | 23,173 | 27,563 |
| Total | 196,621 | 177,156 |

For the Baltimore-Columbia-Towson CBSA (identified by the green cells in Table 3a), the counties/cities NO_x emissions ranked highest to lowest are: Baltimore, MD; Anne Arundel, MD; Baltimore City, MD; Howard, MD; and Carroll, MD, Harford, MD and Queen Anne's MD. Baltimore County and Anne Arundel County have the largest NO_x emissions with each contributing approximately 27% of the total CBSA NO_x emissions. Baltimore City contributes approximately 15% and Howard and Carroll about 10.5% and 9%, respectively. Harford County contributes 8.5% of the total CBSA NO_x emissions and Queen Anne County has the lowest NO_x emissions, contributing about 3%. The counties/cities in the Baltimore-Columbia-Towson CBSA ranked highest to lowest in terms of VOC emissions are: Baltimore, MD (25% of CBSA emissions); Anne Arundel, MD (23%); Baltimore City, MD (17%); Howard, MD (12%); and Harford, MD (12%), Carroll, MD (7%) and Queen Anne's, MD (4%)

The counties/cities ranked by NO_x emissions (highest to lowest) within the Washington-Arlington-Alexandria CBSA (identified by gray cells in Table 3a) are as follows: Prince George's, MD (17%); Montgomery, MD (15%); Fairfax, VA (14%); District of Columbia (7%); and Prince William, VA (6%), Loudoun VA (6%), Frederick, MD (5%), Frederick, VA (4%), Stafford, VA (3%), Charles, MD (3%), Arlington, VA (3%), Spotsylvania, VA (3%), Fauquier, VA (3%), Calvert, MD (1%), Jefferson, WV (1%), Culpeper, VA (1%), Warren, VA (1%), Alexandria City VA (1%), Fredericksburg City, VA (1%), Hampshire WV (1%), Clark, VA (1%), Winchester City, VA (<0.5%), Manassas City, VA (<0.5%), Fairfax City, VA (<0.5%), Rappahannock, VA (<0.5%), Falls Church City, VA (<0.5%), and Manassas Park City, VA (<0.5%). Prince George's County has the highest NO_x emissions in the Washington-Arlington-Alexandria CBSA as well as in the larger Washington-Baltimore-Arlington CSA boundary. The counties/cities with the ranked by VOC emissions (highest to lowest) in the Washington-Arlington-Alexandria CBSA (ranked highest to lowest) are: Montgomery, MD (16%); Fairfax, VA (16%); Prince Georges, MD (13%); District of Columbia (8%); and Prince William (7%), Loudoun, VA (6%), Frederick, MD (5%), Frederick, VA (4%), Charles, MD (3%), Arlington, VA (3%), Fauquier, VA (2%), Hampshire, WV (2%), Alexandria City, VA (2%), Calvert, MD (2%), Rappahannock, VA (2%), Jefferson, WV (1%), Warren, VA (1%), Spotsylvania, VA (1%), Winchester City, VA (1%), Stafford, VA (1%), Fredericksburg City, VA (1%), Manassas City, VA (1%), Fairfax City, VA (1%), Clarke, VA (1%), Falls Church City, VA (<0.5%), Manassas Park City, VA (<0.5%). The five highest VOC areas are also the top five NO_x county-wide emitters within the CBSA. The Washington-Arlington-Alexandria CBSA counties with the three highest VOC emissions, Montgomery, Fairfax, and Prince George's Counties, are also the highest VOC emitters within the larger Washington-Baltimore-Arlington CSA.

Figures 3a and 3b provide a visual representation of the county-level of NO_x and VOC emissions within the entire area of analysis.



Washington DC NAADC Po

Washington DC NAAMD Portion Washington DC NAAVA Portion 24,048 - 70,807 70,808 - 205,621

In Table 3a, the jurisdictions located in the white cells do not fall under the Washington-Arlington-Alexandria CBSA, or the Baltimore-Columbia-Towson CBSA. Each of these counties located in Maryland, West Virginia

or Pennsylvania contribute NO_x emissions that are less than 3% of the total for the CSA. However, there is a mix among how much each of these counties emit individually. Three counties (Washington, MD; Franklin, PA; and Berkeley, WV) each emitted over 4,000 tpy of total NO_x in 2014, while the remaining three counties (Dorchester, MD; Talbot, MD; and St. Mary's, MD) emitted less than 4,000 tpy each. Among these six counties, Dorchester, MD contributes the highest VOC emissions, at 8,893 tpy, which is about 5% of the total Washington-Baltimore-Arlington CSA.

In addition to reviewing county-wide emissions of NO_x and VOC in the area of analysis, EPA also reviewed emissions from large point sources. The location of these sources, together with the other factors, can help inform nonattainment boundaries. The locations of the large point sources are shown in Figure 4 below. The nonattainment boundaries for the two areas are also shown. The Washington-Baltimore area is home to a number of both small and larger point sources that emit NO_x and/or VOCs. The I-95 corridor, which runs through both the Washington-Arlington-Alexandria CBSA and the Baltimore-Columbia-Towson CBSA, provides a home for the majority of these point sources.

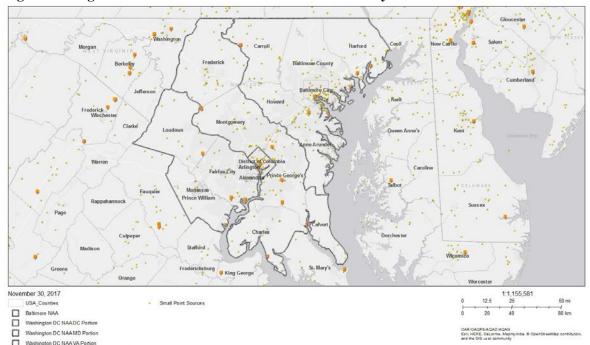


Figure 4. Large and Small Point Sources in the Area of Analysis.

Population density and degree of urbanization

Large Point Sources (VOC GT 100 or NOx GT 100)

In this part of the second factor analysis, EPA evaluated the population and vehicle use characteristics and trends of the area as indicators of the probable location and magnitude of non-point source emissions. These include emissions of NO_x and VOC from on-road and non-road vehicles and engines, consumer products, residential fuel combustion, and consumer services. Areas of dense population or commercial development are an indicator of area source and mobile source NO_x and VOC emissions that may contribute to violations of the NAAQS. Table 4a shows the population, population density, and population growth information for each county in the area of analysis. Counties located in the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA are in cells shaded in gray. Counties located in the Baltimore-Columbia-Towson, MD CBSA are in cells shaded in green. The remaining counties in white are located within other CBSAs of the CSA.

Table 4a. Population and Growth.

| Table 4a. Population and | Growin. | T | T | 2015 | A1. 1.4 | |
|--------------------------|--|--------------------|--------------------|---------------------------------------|--|---------------------------------|
| County, State | State Recommended Nonattainment? | 2010 Population | 2015 Population | 2015 Population Density (per sq. mi.) | Absolute Change in Population (2010- 2015) | Population % Change (2010-2015) |
| Fairfax, VA | Yes | 1,081,726 | 1,142,234 | 2,922 | 60,508 | 5.59 |
| Montgomery, MD | Yes | 971,777 | 1,040,116 | 2,117 | 68,339 | 7.03 |
| Prince George's, MD | Yes | 863,420 | 909,535 | 1,884 | 46,115 | 5.34 |
| Baltimore, MD | Yes | 805,029 | 831,128 | 1,389 | 26,099 | 3.24 |
| District of Columbia | Yes | 601,723 | 672,228 | 11,011 | 70,505 | 11.72 |
| Baltimore City, MD | Yes | 620,961 | 621,849 | 7,682 | 888 | 0.14 |
| Anne Arundel, MD | Yes | 537,656 | 564,195 | 1,360 | 26,539 | 4.94 |
| Prince William, VA | Yes | 402,002 | 451,721 | 1,343 | 49,719 | 12.37 |
| Loudoun, VA | Yes | 312,311 | 375,629 | 729 | 63,318 | 20.27 |
| Howard, MD | Yes | 287,085 | 313,414 | 1,250 | 26,329 | 9.17 |
| Harford, MD | Yes | 244,826 | 250,290 | 573 | 5,464 | 2.23 |
| Frederick, MD | Yes | 233,385 | 245,322 | 372 | 11,937 | 5.11 |
| Arlington, VA | Yes | 207,627 | 229,164 | 8,823 | 21,537 | 10.37 |
| Carroll, MD | Yes | 167,134 | 167,627 | 375 | 493 | 0.29 |
| Charles, MD | Yes | 146,551 | 156,118 | 341 | 9,567 | 6.53 |
| Franklin, PA | No | 149,618 | 153,638 | 199 | 4,020 | 2.69 |
| Washington, MD | No | 147,430 | 149,585 | 327 | 2,155 | 1.46 |
| Alexandria City, VA | Yes | 139,966 | 153,511 | 10,216 | 13,545 | 9.68 |
| Stafford, VA | No | 128,961 | 142,003 | 528 | 13,042 | 10.11 |
| Spotsylvania, VA | No | 122,397 | 130,475 | 325 | 8,078 | 6.60 |
| Berkeley, WV | No | 104,169 | 111,901 | 348 | 7,732 | 7.42 |
| St. Mary's, MD | No | 105,151 | 111,413 | 312 | 6,262 | 5.96 |
| Calvert, MD | Yes | 88,737 | 90,595 | 425 | 1,858 | 2.09 |
| Frederick, VA | No | 78,305 | 83,199 | 201 | 4,894 | 6.25 |
| Fauquier, VA | No | 65,203 | 68,782 | 106 | 3,579 | 5.49 |
| Jefferson, WV | No | 53,498 | 56,482 | 269 | 2,984 | 5.58 |
| Culpeper, VA | No | 46,689 | 49,432 | 130 | 2,743 | 5.88 |
| Queen Anne's, MD | No | 47,798 | 48,904 | 131 | 1,106 | 2.31 |
| Manassas City, VA | Yes | 37,821 | 41,764 | 4,227 | 3,943 | 10.43 |
| Warren, VA | No | 37,575 | 39,083 | 183 | 1,508 | 4.01 |
| Talbot, MD | No | 37,782 | 37,512 | 140 | -270 | -0.71 |
| Dorchester, MD | No | 32,618 | 32,384 | 60 | -234 | -0.72 |
| Fredericksburg City, VA | No | 24,286 | 28,118 | 2,693 | 3,832 | 15.78 |
| Winchester City, VA | No | 26,203 | 27,284 | 2,955 | 1,081 | 4.13 |
| Fairfax City, VA | Yes | 22,565 | 24,013 | 3,849 | 1,448 | 6.42 |
| Hampshire, WV | No | 23,964 | 23,353 | 36 | -611 | -2.55 |
| Manassas Park City, VA | Yes | 14,273 | 15,726 | 6,206 | 1,453 | 10.18 |
| Clarke, VA | No | 14,034 | 14,363 | 82 | 329 | 2.34 |
| Falls Church City, VA | Yes | 12,332 | 13,892 | 6,949 | 1,560 | 12.65 |
| Rappahannock, VA | No | 7,373 | 7,378 | 28 | 5 | 0.07 |
| Area Wi | de | 9,051,961 | 9,625,360 | 762 | 573,399 | 6.33 |

Source: U.S. Census Bureau population estimates for 2010 and 2015. https://www.census.gov/data.html. https://www.census.gov/data.html.

Table 4b provides summary information for the three analysis areas: the Washington-Arlington-Alexandria CBSA, the Baltimore-Columbia-Towson CBSA and a grouping of all the remaining counties in the CSA which are not included in either of the previously mentioned CBSAs.

Table 4b. CSA Population and Growth.

| Area | 2015 Population Density (per sq. mi.) | Population % Change (2010-2015) |
|---|---------------------------------------|---------------------------------|
| Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA (including the following jurisdictions: DC, Calvert, Charles, Frederick, Montgomery, and Prince George's Counties in Maryland; Hampshire and Jefferson Counties in West Virginia; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Frederick, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren Counties in Virginia; and Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, Manassas Park, and Winchester Cities in Virginia. | 853 | 8.10 |
| Baltimore-Columbia-Towson, MD CBSA (including the following jurisdictions: Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's Counties as well as Baltimore City in Maryland. | 1,075 | 3.21 |
| Remaining Areas of Washington-Baltimore-Arlington CSA which are not included in the above two CBSAs. (including the following jurisdictions: Dorchester, Talbot, Washington, and St. Mary's Counties in Maryland; Berkeley County in West Virginia; and Franklin County in Pennsylvania. | 219 | 3.41 |

Of the 10 counties/cities with the largest 2015 population, six fall within the Washington-Arlington-Alexandria CBSA boundaries: Fairfax County, VA; Montgomery County, VA; Price George's County, MD; District of Columbia; Prince William County, VA; and Loudon, VA. The other four areas with the largest 2015 population fall under the Baltimore-Columbia-Towson CBSA jurisdiction: Baltimore County, MD; Baltimore City, MD; Anne Arundel County, MD; and Howard, County, MD. As of 2015, over 6 million people reside within the Washington CSBA and over 2.5 million live within the Baltimore CBSA.

The Washington-Arlington-Alexandria CBSA overall has experienced high population growth between 2010 and 2015. Nine jurisdictions have experienced population growth greater than 10 percent: Loudoun County, VA (20.27); Fredericksburg City, VA (15.78); Falls Church City, VA (12.65); Prince William County, VA (12.37); District of Columbia (11.72); Manassas City, VA (10.43); Arlington, VA (10.37); Manassas Park City, VA (10.18); and Stafford County, VA (10.11). Within the Washington CBSA, Hampshire, WV is the only area experiencing negative population growth and Rappahannock remained essentially unchanged. Clark and Calvert Counties had relativity low growth for the area, with growth rates of slightly over 2 percent.

While Fairfax, VA, Montgomery, MD, and Prince George's, MD have only moderate growth rates for the area of 5.59, 7.03, and 5.34, respectively, these counties have the largest populations amongst all of the Washington CBSA and also the Washington Baltimore-Arlington CSA jurisdictions. A number of the jurisdictions had moderate growth (around 5 to 7 percent) and mid-range total population. These areas include Anne Arundel, Frederick, Charles, and St. Mary's Counties in Maryland as well as Spotsylvania County in Virginia. It also includes slightly smaller jurisdictions like Frederick, Fauquier, and Culpeper Counties in Virginia as well as Jefferson County in West Virginia. Other Washington CBSA jurisdictions experiencing moderate growth rates, such as Falls Church City, VA and Manassas Park City, VA, have the smallest populations in the area. Most of the jurisdictions had moderate growth (around 5 to 7 percent) and mid-range total population.

The District of Columbia, Alexandria City, VA, and Arlington, VA, all within the Washington CBSA, have the highest population densities (person per square mile) within the Washington CBSA and the Washington-Baltimore-Arlington CSA. The three areas within the CBSA that have the lowest population densities (Rappahannock, VA; Hampshire, WV; and Clarke, VA) also have the lowest population densities within the CSA.

The areas included in the Baltimore CBSA have a wide diversity of population densities, ranging from 131 people per square mile (Queen Anne's, MD) to 7,682 people per square mile (Baltimore City, MD). Baltimore County has the fourth largest population within the Washington-Baltimore-Arlington CSA with over 800,000 residents in 2015. Those living in Harford and Baltimore Counties account for almost 40% of the entire population residing within the Baltimore CBSA. This population is also in close proximity to the Harford monitor, located in Edgewood, MD, with the highest design value in the CSA. Baltimore CBSA residents account for 29% of the total population within the CSA.

Of the counties outside either the Washington nor Baltimore CBSA (identified in the white cells in Table 4a), most are relatively sparsely populated with populations ranging from approximately 32,000 to 154,000 and population densities ranging from 60 to 348. Two of these six counties, Talbot and Dorchester, MD, had negative population growth between 2010 and 2015. These counties rank among the least densely populated areas within the Washington-Baltimore-Arlington CSA. In total, the population within these areas account for only 6% of residents living within the CSA. Figure 5 shows the county-level population density for the area of analysis.

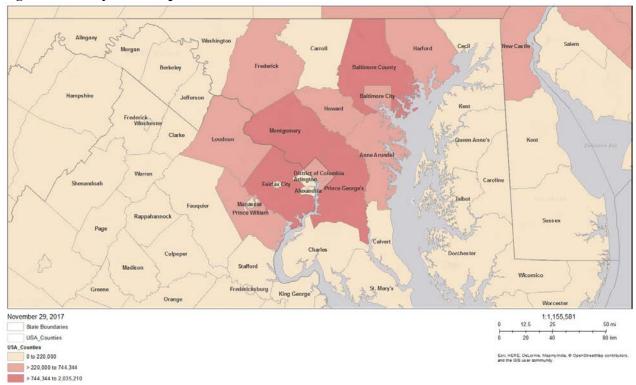


Figure 5. County-Level Population.

Traffic and Vehicle Miles Travelled (VMT)

EPA evaluated the commuting patterns of residents, as well as the total vehicle miles traveled (VMT) for each county in the area of analysis. In combination with the population/population density data and the location of main transportation arteries, this information helps identify the probable location of non-point source emissions.

A county with high VMT and/or a high number of commuters is generally an integral part of an urban area and high VMT and/or high number of commuters indicates the presence of motor vehicle emissions that may contribute to violations of the NAAQS. Rapid population or VMT growth in a county on the urban perimeter may signify increasing integration with the core urban area, and thus could indicate that the associated area source and mobile source emissions may be appropriate to include in the nonattainment area. In addition to VMT, EPA evaluated worker data collected by the U.S. Census Bureau⁸ for the area of analysis, the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA. Table 5a shows the traffic and commuting pattern data, including total VMT for each county, number of residents who work in each county, number of residents that work in counties with violating monitors, and the percent of residents working in counties with violating monitors. In addition, Table 5b shows the number and percentage of residents who commute within their county of residence. The data in Tables 5a and 5b are from 2014 and come from the VMT spreadsheet from the Ozone Designations web page, https://www.epa.gov/ozone-designations/ozone-designations-guidance-and-data, as well as On the Map from the Census Bureau, https://onthemap.ces.census.gov/.

Table 5a. Traffic and Commuting Patterns.^a

| County, State | State Recommende d Attainment? | 2014 Total VMT (Million Miles) | Number of County Residents Who Work | Number Commuting to or Within Counties with Violating Monitors | Percentage Commuting to or Within Counties with Violating Monitors |
|----------------------|--------------------------------|---|--|--|--|
| Fairfax, VA | Yes | 9,642 | 513,786 | 41,031 | 7.99% |
| Prince George's, MD | Yes | 8,563 | 414,287 | 23,048 | 5.56% |
| Baltimore, MD | Yes | 8,027 | 399,242 | 172,832 | 43.29% |
| Montgomery, MD | Yes | 7,172 | 468,752 | 19,260 | 4.11% |
| Anne Arundel, MD | Yes | 5,620 | 253,808 | 23,233 | 9.15% |
| Howard, MD | Yes | 3,863 | 147,383 | 17,268 | 11.72% |
| District of Columbia | Yes | 3,649 | 286,131 | 13,691 | 4.78% |
| Prince William, VA | Yes | 3,382 | 197,743 | 9,886 | 5.00% |
| Baltimore City, MD | Yes | 3,282 | 245,424 | 65,277 | 26.20% |
| Frederick, MD | Yes | 2,913 | 120,851 | 5,319 | 4.40% |
| Loudoun, VA | Yes | 2,588 | 185,175 | 8,793 | 4.75% |
| Harford, MD | Yes | 2,354 | 116,325 | 72,350 | 62.20% |
| Washington, MD | No | 1,948 | 66,251 | 2,470 | 3.73% |
| Stafford, VA | No | 1,866 | 51,967 | 1,624 | 3.13% |
| Arlington, VA | Yes | 1,550 | 113,965 | 21,414 | 18.79% |
| Franklin, PA | No | 1,440 | 66,408 | 736 | 1.11% |
| Spotsylvania, VA | No | 1,336 | 53,824 | 957 | 1.78% |
| Fauquier, VA | No | 1,289 | 35,991 | 1,111 | 3.09% |
| Carroll, MD | Yes | 1,225 | 86,566 | 18,129 | 20.94% |
| Charles, MD | Yes | 1,217 | 69,127 | 3,773 | 5.46% |
| Frederick, VA | No | 1,118 | 37,689 | 314 | 0.83% |
| Berkeley, WV | No | 1,037 | 48,864 | 385 | 0.79% |
| Queen Anne's, MD | No | 915 | 23,285 | 1,244 | 5.34% |
| St. Mary's, MD | No | 871 | 43,533 | 1,371 | 3.15% |
| Alexandria City, VA | Yes | 755 | 73,045 | 8,632 | 11.82% |

| Calvert, MD | Yes | 723 | 35,543 | 1,374 | 3.87% |
|---------------------------|-----|-----|--------|-------|--------|
| Talbot, MD | No | 605 | 17,345 | 877 | 5.06% |
| Culpeper, VA | No | 553 | 20,421 | 355 | 1.74% |
| Jefferson, WV | No | 477 | 25,464 | 187 | 0.73% |
| Warren, VA | No | 450 | 19,305 | 405 | 2.10% |
| Fredericksburg City, | Yes | | | | |
| VA | | 392 | 10,315 | 209 | 2.03% |
| Dorchester, MD | No | 354 | 15,502 | 780 | 5.03% |
| Clarke, VA | No | 294 | 7,357 | 161 | 2.19% |
| Hampshire, WV | No | 199 | 8,937 | 81 | 0.91% |
| Fairfax City, VA | Yes | 175 | 11,266 | 785 | 6.97% |
| Manassas City, VA | Yes | 158 | 19,366 | 711 | 3.67% |
| Winchester City, VA | No | 137 | 12,240 | 87 | 0.71% |
| Rappahannock, VA | No | 93 | 2,933 | 19 | 0.65% |
| Falls Church City, VA | Yes | 50 | 6,074 | 703 | 11.57% |
| Manassas Park City, VA | Yes | 25 | 7,169 | 252 | 3.52% |

^a Counties with a monitor(s) violating the NAAQS are indicated in bold.

Table 5b. Traffic and Commuting Within County.

| County, State | State Recommended Attainment? | 2014 Total VMT (Million Miles) | Number of County Residents Who Work | Number Commuting Within Own County | Percentage Commuting Within Own County |
|----------------------|-------------------------------------|--|--|---|---|
| Fairfax, VA | Yes | 9,642 | 513,786 | 235,797 | 45.89% |
| Prince George's, MD | Yes | 8,563 | 414,287 | 117,332 | 28.32% |
| Baltimore, MD | Yes | 8,027 | 399,242 | 162,157 | 40.62% |
| Montgomery, MD | Yes | 7,172 | 468,752 | 231,790 | 49.45% |
| Anne Arundel, MD | Yes | 5,620 | 253,808 | 107,006 | 42.16% |
| Howard, MD | Yes | 3,863 | 147,383 | 43,597 | 29.58% |
| District of Columbia | Yes | 3,649 | 286,131 | 189,302 | 66.16% |
| Prince William, VA | Yes | 3,382 | 197,743 | 47,344 | 23.94% |
| Baltimore City, MD | Yes | 3,282 | 245,424 | 114,284 | 46.57% |
| Frederick, MD | Yes | 2,913 | 120,851 | 47,840 | 39.59% |
| Loudoun, VA | Yes | 2,588 | 185,175 | 56,151 | 30.32% |
| Harford, MD | Yes | 2,354 | 116,325 | 42,752 | 36.75% |
| Washington, MD | No | 1,948 | 66,251 | 32,878 | 49.63% |
| Stafford, VA | No | 1,866 | 51,967 | 11,648 | 22.41% |
| Arlington, VA | Yes | 1,550 | 113,965 | 21,181 | 18.59% |
| Franklin, PA | No | 1,440 | 66,408 | 32,471 | 48.90% |
| Spotsylvania, VA | No | 1,336 | 53,824 | 13,568 | 25.21% |
| Fauquier, VA | No | 1,289 | 35,991 | 8,452 | 23.48% |
| Carroll, MD | Yes | 1,225 | 86,566 | 27,476 | 31.74% |
| Charles, MD | Yes | 1,217 | 69,127 | 16,175 | 23.40% |
| Frederick, VA | No | 1,118 | 37,689 | 8,610 | 22.84% |
| Berkeley, WV | No | 1,037 | 48,864 | 20,902 | 42.78% |

| Queen Anne's, MD | No | 915 | 23,285 | 5,677 | 24.38% |
|-------------------------|-----|-----|--------|--------|--------|
| St. Mary's, MD | No | 871 | 43,533 | 19,413 | 44.59% |
| Alexandria City, VA | Yes | 755 | 73,045 | 12,091 | 16.55% |
| Calvert, MD | Yes | 723 | 35,543 | 11,602 | 32.64% |
| Talbot, MD | No | 605 | 17,345 | 7,308 | 42.13% |
| Culpeper, VA | No | 553 | 20,421 | 6,197 | 30.35% |
| Jefferson, WV | No | 477 | 25,464 | 7,364 | 28.92% |
| Warren, VA | No | 450 | 19,305 | 4,836 | 25.05% |
| Fredericksburg City, VA | Yes | 392 | 10,315 | 2,326 | 22.55% |
| Dorchester, MD | No | 354 | 15,502 | 5,119 | 33.02% |
| Clarke, VA | No | 294 | 7,357 | 993 | 13.50% |
| Hampshire, WV | No | 199 | 8,937 | 2,112 | 23.63% |
| Fairfax City, VA | Yes | 175 | 11,266 | 1,010 | 8.97% |
| Manassas City, VA | Yes | 158 | 19,366 | 2,648 | 13.67% |
| Winchester City, VA | No | 137 | 12,240 | 4,038 | 32.99% |
| Rappahannock, VA | No | 93 | 2,933 | 576 | 19.64% |
| Falls Church City, VA | Yes | 50 | 6,074 | 509 | 8.38% |
| Manassas Park City, VA | Yes | 25 | 7,169 | 406 | 5.66% |

As can be seen in Tables 5a and 5b, the five counties with the highest VMT in the area of analysis (ranked highest to lowest) are: Fairfax, VA; Prince George's, MD; Baltimore, MD; Montgomery, MD; and Anne Arundel, MD. Rappahannock County, Virginia and the cities of Falls Church and Manassas Park in Virginia have the lowest VMT within the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA, all with less than 100 million total VMT within each jurisdiction.

Fairfax County, VA, and Montgomery and Prince George's Counties in Maryland have the largest numbers of residents who work within the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA while Rappahannock, VA has the fewest number of residents working in the CSA. Rappahannock, VA also has the lowest percentage of workers commuting into counties with violating monitors. Within the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA, Harford, and Baltimore Counties in Maryland have the highest percentage of workers commuting into counties with violating monitors. However, 37% of Harford, MD residents and 41% of Baltimore, MD residents commute within their own counties. Nineteen percent of Arlington, VA residents commute within their own county.

The Washington CBSA contains over 60% of the total 2014 VMT within the Washington-Baltimore-Arlington CSA and approximately 65% of total CSA residents who work. There is a vast disparity in the absolute VMT values within the Washington CBSA counties. The VMT of Fairfax, VA is over 48 times that of Hampshire, WV and over 13 times that of Calvert, MD. In the Washington CBSA, the three counties with the highest absolute VMT are Fairfax County, VA, and Prince George's and Montgomery Counties in Maryland. The cities of Alexandria, Fairfax, Falls Church, Manassas and Manassas Park each have less than 17% of their working population working within their own county. This indicates that a majority of the working population within these small areas commute to other areas, which could presumably be towards the District of Columbia and its neighboring counties in Virginia, including Arlington, which has a violating monitor.

The Baltimore CBSA contains 31% of the total 2014 VMT within the Washington-Baltimore-Arlington CSA. Baltimore County, MD (8,027 million VMT) is the county with the highest VMT within the Baltimore CBSA while Queen Anne's County, MD (915 million VMT) has the lowest within the CBSA.

⁹ This analysis does not look at such physically small areas as the cities of Alexandria, Fairfax, Falls Church, Manassas and Manassas Park.

The remaining areas that are within the CSA, but outside of either the Baltimore or Washington CBSA, comprise 8% of the Washington-Baltimore-Arlington CSA's total VMT and 6% of the Washington-Baltimore-Arlington CSA's total workers. Of these remaining counties, all but one (Dorchester, MD) have over 40% of their working population commuting within their own county.

As shown in Figure 6, I-95 runs through the area of analysis from Stafford, VA northeast through Harford, MD, with two major beltways that circle the Washington metropolitan area and the Baltimore metropolitan area. Figure 6 also shows high VMT through these traffic corridors, where the majority of violating monitors in the area of analysis are located.

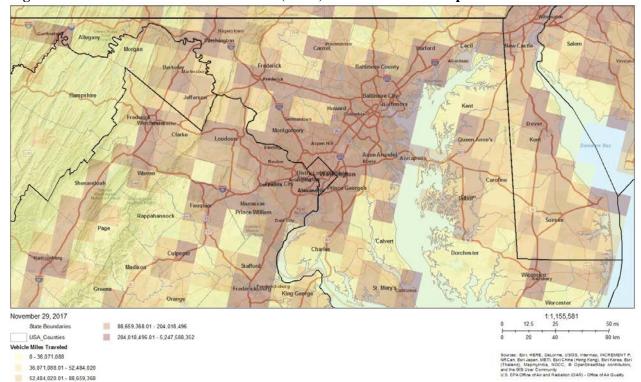


Figure 6. Twelve Kilometer Gridded VMT (Miles) Overlaid with Transportation Arteries.

Factor 3: Meteorology

Evaluating meteorological data helps to assess the fate and transport of emissions contributing to ozone concentrations and to identify areas potentially contributing to the monitored violations. Results of meteorological data analysis may inform the determination of nonattainment area boundaries. In order to determine how meteorological conditions, including, but not limited to, weather, transport patterns, and stagnation conditions, could affect the fate and transport of ozone and precursor emissions from sources in the area, EPA evaluated 2014-2016 HYSPLIT (HYbrid Single-Particle Lagrangian Integrated Trajectory) trajectories at 100, 500, and 1000 meters above ground level (AGL) that illustrate the three-dimensional paths traveled by air parcels to a violating monitor. Figures 7a through 7h show the 24-hour HYSPLIT back trajectories of for each exceedance day (i.e., daily maximum 8-hour values that exceed the 2015 ozone NAAQS) for the violating monitors.

¹⁰ EPA memorandum "Area Designations for the 2015 Ozone National Ambient Air Quality Standards." Attachment 3. https://www.epa.gov/sites/production/files/2016-02/documents/ozone-designations-guidance-2015.pdf

The HYSPLIT back trajectories for violating monitor 240051007 in Baltimore County, MD are shown in Figure 7a. The back trajectories at the 1,000 meter AGL indicate the monitor receives input from almost every direction, though most heavily from the southwest. The trajectory lines in red, which indicate air particles traveling 100 meters AGL, look to come mostly from the south, with additional input from west, and east. Figure 7b shows the HYSPLIT back trajectories for the other violating monitor within Baltimore County, 240053001. The back trajectories at the 1,000 meter AGL indicate that this monitor also receives input from almost every direction, though this time most heavily from north of the monitor. The lower traveling trajectory lines in red, seem to come partly from the north, but more consistently from the south. Figure 7c shows the HYSPLIT back trajectories for both violating Baltimore County, MD monitors overlaying VMT. As seen in Figure 7c, the largest clustering of HYSPLIT back trajectories travel along the I-95 corridor and from within the Washington-Baltimore-Arlington CSA main commuter area. However, other back trajectories, mainly the higher altitude 1,000 m AGL (shown in green) lines seem to travel along areas with less vehicle miles traveled indicated.

The HYSPLIT back trajectories for Harford County, MD violating monitors 240251001 and 240259001 are shown in Figures 7d and 7e, respectively. These trajectories indicate that these two monitors are downwind of Baltimore County, Baltimore City, the counties of Anne Arundel, Howard, Montgomery, Prince George's, Frederick in Maryland as well as Arlington County, VA and the District of Columbia. The figures indicate that on exceedance days, the air particles traveling at the higher altitudes look to meet up with air particles traveling at the lower levels in the Baltimore City/Baltimore County area, all of which look to continue on towards Harford County, MD. The air particles traveling at the higher altitudes, 500-1,000 meters AGL, look to come most heavily from areas northwest of Baltimore while the air particles traveling at the lower level, 100 meters AGL, look to come mostly from the south and southeast which includes Anne Arundel and Calvert Counties in Maryland. Figure 7f shows both the VMT of the area of analysis as well as the HYSPLIT back trajectories. Figure 7f shows that the Baltimore and District of Columbia commuting zones contribute heavily to the Harford County monitors, though it is apparent that not all contributions come from the I-95 corridor.

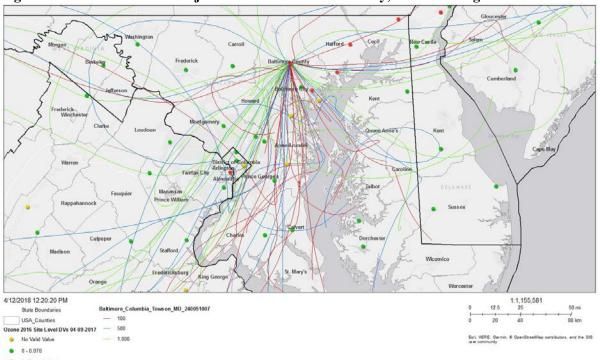
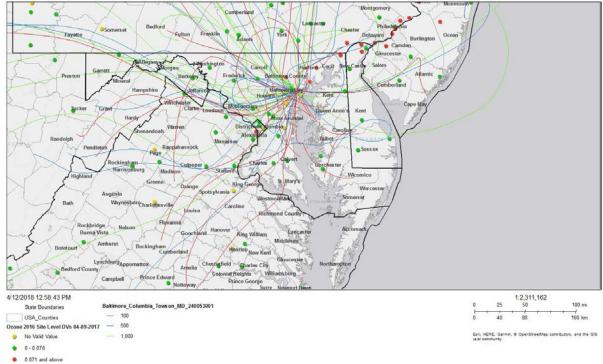


Figure 7a. HYSPLIT Back Trajectories for Baltimore County, MD Violating Monitor 240051007a.

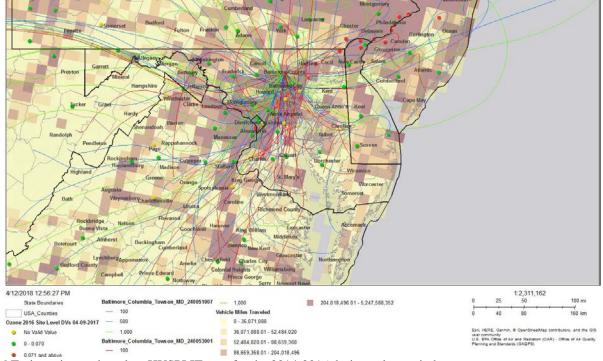
Figure 7b. HYSPLIT Back Trajectories for Baltimore County, MD Violating Monitor 240053001a.

^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.



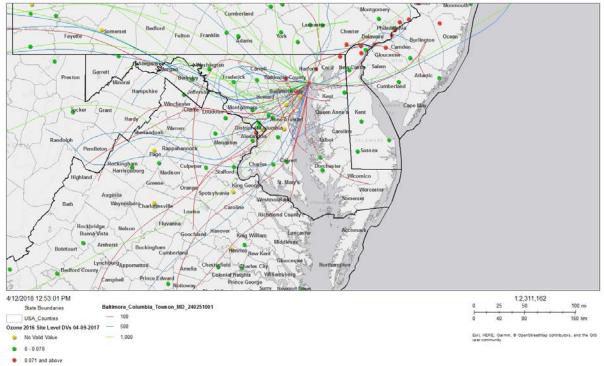
^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.

Figure 7c. VMT and HYSPLIT Back Trajectories for Violating Monitors in Baltimore County, MDa.



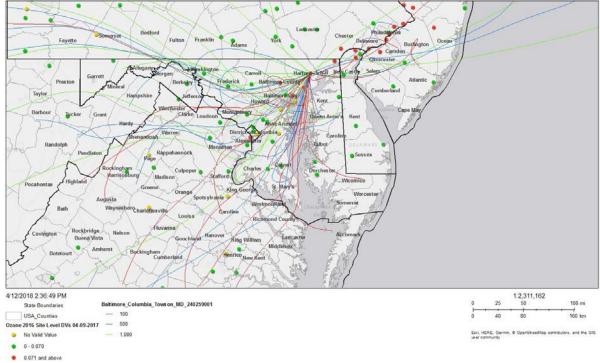
^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.

Figure 7d. HYSPLIT Back Trajectories for Harford County, MD Violating Monitor 240251001^a.



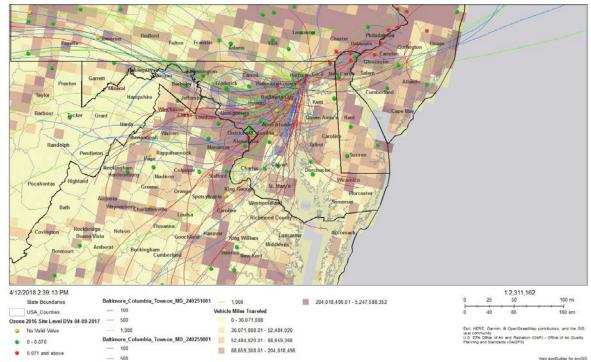
^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.





^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.

Figure 7f. VMT and HYSPLIT Back Trajectories for Violating Monitors in Harford County, MDa.



^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.

As shown in Figure 7g, below, the meteorology for Arlington County, VA indicates its violating monitor is downwind of the District of Columbia, Howard, Baltimore, Carroll, Frederick, and Montgomery Counties in Maryland, all of which are north of Arlington. The back trajectories also show that the Arlington monitor is impacted by the following counties and cities which are southwest of Arlington County: Stafford, Spotsylvania, Manassas, Manassas Park, Alexandria, Fairfax, Falls Church, and Charles. The back trajectories coming from the southwest look to be concentrated over the I-95 corridor.

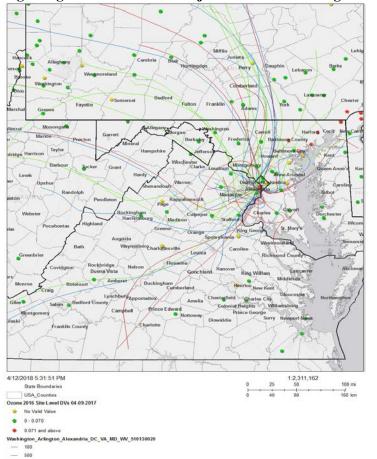


Figure 7g. HYSPLIT Back Trajectories for the Arlington County, VA Violating Monitor^a.

Factor 4: Geography/topography

Consideration of geography or topography can provide additional information relevant to defining nonattainment area boundaries. Analyses should examine the physical features of the land that might define the airshed. Mountains or other physical features may influence the fate and transport of emissions as well as the formation and distribution of ozone concentrations. The absence of any such geographic or topographic features may also be a relevant consideration in selecting boundaries for a given area.

EPA used geography/topography analysis to evaluate the physical features of the land that might affect the airshed and, therefore, the distribution of ozone over the area.

As can be seen in Figure 8, the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA area does not have any geographical or topographical features significantly limiting air pollution transport within its air shed. Therefore, this factor did not play a role in this evaluation.

^a Trajectories are based on HYSPLIT runs for the 2014-2016 design value period.

merset Bedford Fulton Franklin Adams

York Delaware Burlington Ocean

Cambelland Belaware Burlington Ocean

Manual Harbor Cecil New Casth Salem

Berkeley Februs Fredericks Baltimore County

Hardy Clarke Loudoum Honor Caroli Hardy Cecil New Casth Salem

Winchester Howard Junio County

Arlington Carolin Hardy Cecil New Casth Salem

Winchester Cape May

Shenandoah Warren Arlington County

Manual Arlington County

Arlington County

Manual Arlington County

Cape May

Shenandoah Warren Stafford Carolin Alexandria

Arlington Charles Cape May

Charles Carolin Carolin County

Manual Arlington County

Cape May

Sussex

Ockingham Sussex Sussex

Cape May

Sussex

Carolin Cape May

Charles Carolin County

Mind George Stafford Charles Cape May

Nelson Fluvanna

Ring William Laricaster Middleses

Arlington County

Maynesboro Charlottis Vinigle

Louis a Mark Stafford County

Sale Boundaries Ozone 2016 Site Level DVs 04-09-2017 0.071 and above

USA Counties No Valid Value

Doces Early Ring George Stafford County

Some Stafford County

Arlington County

Arlington County

Arlington County

Mindleses

Arlington County

Arlington County

Cape May

Sussex

Carolin Camber Maynes Cape May

Cape May

Sussex

Sussex

Ocean Arlington County

Arlington County

Cape May

Counties Cape May

Cape

Figure 8. Topographic illustration of the Washington-Baltimore-Arlington CSA.

Factor 5: Jurisdictional boundaries

Once the geographic extent of the violating areas and the nearby areas contributing to violations was determined, EPA considered existing jurisdictional boundaries for the purposes of providing a clearly defined legal boundary to carry out the air quality planning and enforcement functions for nonattainment areas. In defining the boundaries of the potential nonattainment areas, EPA considered existing jurisdictional boundaries, which can provide easily identifiable and recognized boundaries for purposes of implementing the NAAQS. Examples of jurisdictional boundaries include, but are not limited to: Counties, air districts, areas of Indian country, metropolitan planning organizations, and existing nonattainment areas. If an existing jurisdictional boundary is used to help define the nonattainment area, it must encompass all of the area that has been identified as meeting the nonattainment definition. Where existing jurisdictional boundaries are not adequate or appropriate to describe the nonattainment area, EPA considered other clearly defined and permanent landmarks or geographic coordinates for purposes of identifying the boundaries of the designated areas.

As previously discussed in the TSD, the area of analysis is the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA, which includes several CBSAs in Maryland, Virginia, West Virginia, Pennsylvania, and the District of Columbia. Of the seven CBSAs which make up the Washington-Baltimore-Arlington CSA, there are two CBSAs which account for a majority of the area; the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA and the Baltimore-Columbia-Towson, MD CBSA.

In regard to transportation planning, the Baltimore CBSA and the Washington CBSA are served by different MPOs. An MPO is the policy board of an organization created and designated to carry out the metropolitan transportation planning processes.¹¹ The Baltimore Regional Transportation Board covers Baltimore City and the counties of Anne Arundel, Baltimore, Carroll, Harford and Howard in Maryland.

https://www.transit.dot.gov/regulations-and-guidance/transportation-planning/metropolitan-planning-organization-mpo

The National Capital Region Transportation Planning Board (TPB) is the MPO for a sizable portion of the Washington CBSA, covering the District of Columbia and surrounding jurisdictions. ¹² In Maryland these jurisdictions include Frederick County, Montgomery County, Prince George's County, and Charles County. In Virginia, the planning area includes the counties of Arlington, Fairfax, Loudoun and Prince William and the cities of Alexandria, Fairfax, Falls Church, Manassas and Manassas Park.

The Fredericksburg Area Metropolitan Planning Organization (FAMPO) planning area consists of Spotsylvania and Stafford Counties, as well as the City of Fredericksburg in Virginia.

The air quality planning for the Washington DC-MD-VA area has been a multi-jurisdictional area since before 1990. The Metropolitan Washington Air Quality Committee (MWAQC), a multi-state air quality planning organization, includes members from the air management and transportation directors of the District of Columbia, Maryland, and Virginia. The principal mandates of MWAQC are to prepare plans demonstrating attainment of the federal ozone standards and "rate of progress" reductions in criteria pollutants and prepare inventories and budgets of emissions for the current Washington, DC-MD-VA nonattainment area.

Also, as previous noted the Washington DC and Baltimore areas have previously been designated nonattainment for multiple ozone NAAQS. For each NAAQS, the two areas have been designated as separate nonattainment areas.

Conclusion

The Washington area and Baltimore area have previously established nonattainment boundaries associated with the 1997 and 2008 ozone NAAQS. Maryland, Virginia, and the District of Columbia have recommended the same boundaries for the 2015 ozone NAAQS.

EPA is not modifying the states' recommendations to establish two separate nonattainment areas or their recommendation to establish the same nonattainment boundaries for the 2015 ozone NAAQS as were promulgated previously for both the 1997 and 2008 ozone NAAQS. EPA therefore is designating a Washington, DC-MD-VA nonattainment area and a separate Baltimore, MD nonattainment area for the 2015 ozone NAAQS. As explained in the jurisdictional factor, these two areas are served by different MPOs. The designation of these two areas under the previous ozone NAAQS has given the counties within the areas experience working together and EPA believes this experience and history will continue to support the ability of the area as a whole to timely attain the 2015 ozone NAAQS.

Summary Analysis of Cities/Counties Within the Baltimore-Columbia-Towson, MD CBSA

Baltimore County, MD and Harford County, MD

The air quality monitors in Baltimore County and Harford County indicate violations of the 2015 ozone NAAQS based on the 2016 design values, therefore these counties are included in the Baltimore nonattainment area.

Baltimore City, MD; Anne Arundel County, MD; Carroll County, MD; and Howard County, MD Baltimore City, Anne Arundel County, Carroll County, and Howard County do not have monitors that are violating the 2015 ozone NAAQS, however they are adjacent and nearby to Baltimore and Harford Counties that do have violating monitors. Additionally, the meteorology shows, in Figures 7a, 7b, 7d, and 7e that emissions from these counties are transported to violating monitors in Harford and Baltimore Counties on days when those monitors are exceeding the NAAQS. Anne Arundel County and Baltimore City have the second and third highest total NO_x emissions within the Baltimore-Columbia-Towson CBSA. Anne Arundel County has

¹² https://www.mwcog.org/tpb/

the highest total VOC emissions of any jurisdiction in the CBSA. Baltimore City, Anne Arundel County, Carroll County, and Howard County are among the top third of all the Washington-Baltimore-Arlington CSA jurisdictions when it comes to population size. On average, 29% of residents in these areas commute to a county with a violating monitor. The Baltimore Regional Transportation Board area covers Baltimore City and the counties of Anne Arundel, Carroll, and Howard in Maryland. EPA is not modifying the State's recommendation to include these counties in the Baltimore nonattainment area for the 2015 ozone NAAQS.

Queen Anne's County, Maryland

The Chesapeake Bay sits between Queen Anne's County, MD, and the majority of the remaining areas included in the Washington-Baltimore-Arlington CSA, including the four counties with violating monitors. Queen Anne's County has the lowest NO_x emissions of any county in the Baltimore CBSA. When looking at total NO_x emissions within the Baltimore CBSA, Queen Anne's County emits less than half of what the area with next lowest emissions does and eight times less than that of the highest emitting area. ¹³ EPA is not modifying the State's recommendation that Queen Anne's County, MD not be included in the nonattainment area.

Based on the above, EPA is not modifying the State's recommendation to designate Baltimore, Anne Arundel, Carroll, Harford and Howard Counties, and Baltimore City as the Baltimore, MD nonattainment area for the 2015 ozone NAAQS. Further, EPA is designating Queen Anne's County, MD as attainment/unclassifiable for the 2015 ozone NAAQS.

Summary Analysis of Cities/Counties Within the Washington-Arlington-Alexandria, DC-VA-MD-WV CBSA

Arlington County, VA

The air quality monitor in Arlington County, VA indicates a violation of the 2015 ozone NAAQS based on the 2016 design values, therefore this county is included in the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS.

Fairfax County, VA; Prince George's County, MD; and Montgomery County, MD
Within the Washington-Baltimore-Arlington CSA, Fairfax County had the highest population in both 2010 and 2015, gaining over 60,000 people in those five years. Prince George's County has the third largest population within the Washington-Baltimore-Arlington CSA. In regard to the Washington CBSA, the three counties with the highest absolute VMT are Fairfax County, VA, and Prince George's and Montgomery Counties in Maryland. Prince George's County, Fairfax County, and Montgomery County also have among the highest emissions of any other jurisdictions in the CSA. Additionally, the meteorology shows, in Figure 7g that emissions from these counties are transported to the violating monitor in Arlington County on days when the monitor exceeds the NAAQS. Fairfax, Prince George's and Montgomery Counties are all included in the area covered by the National Capital Region TPB. EPA is not modifying Virginia's and Maryland's recommendation to include these counties in the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS.

District of Columbia

While the District of Columbia emits a little less than half the amount of total NO_x per year as Montgomery County, MD, that county has an area eight times the size of the District. The District of Columbia has the highest population density (11,011 people per square mile) among all jurisdictions in the Washington-Baltimore-Arlington CSA. The District's population increased by almost 12% between 2010 and 2015, gaining over 70,000 residents in those years. Traffic and commuting information is consistent with the fact that the District is at the core of this large metropolitan area. Additionally, the meteorology shows, in Figure 7g that emissions from the District are transported to the violating monitor in Arlington County on days when the

¹³ According to the 2014 NEI, Queen Anne's County, MD emits 1,926 tpy of total NOx. The Baltimore CBSA area with the next smallest emissions of total NOx is Harford County, MD with 5,433 tpy. Baltimore County, MD emits the largest amount of total NOx within the Baltimore CBSA with 17,552 tpy.

monitor exceed the NAAQS. The District is also included in the area covered by the National Capital Region TPB. EPA is not modifying the District of Columbia's recommendation that it be included in the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS.

Prince William County, VA; Loudoun County, VA; Frederick County, MD; Calvert County, MD; and Charles County, MD

While none of these counties have a violating monitor, they share other characteristics that support inclusion in the nonattainment area. NO_x emission levels in these counties are moderately high for the area and are generally higher than counties to the west, which are more remote from the violating monitors and the urban core (e.g. Stafford, Culpeper, Fauquier, and Clarke Counties in Virginia and Jefferson County in West Virginia). Prince William, Loudoun, and Frederick Counties are among the top third of all the Washington CBSA's jurisdictions when it comes to population. Loudoun County, VA saw a population increase of over 20% in the years between 2010 and 2015, while Prince William County, VA saw an increase of over 12% during the same time period. These counties are included in the area covered by the National Capital Region TPB. EPA is not modifying Virginia's and Maryland's respective recommendations that these five counties be included in the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS.

Cities of Alexandria, Fairfax, Falls Church, Manassas and Manassas Park in Virginia

Each of these cities are relatively small in land mass, which is reflected by populations lower than a number of the other jurisdictions, but have relatively high population density. Alexandria City in particular has one of the highest population densities (with over 10,000 people per square mile) among all other jurisdictions in the Washington-Baltimore-Arlington CSA. While the rest of theses counties do not have quite the population density as Alexandria, they do have moderately high population densities of 4,000-7,000 people per square mile. Each has less than 17% of their working population working within their own county, indicating that a majority of the working population within these small areas commute to other areas. These commutes could take these workers towards the District of Columbia and its neighboring counties in Virginia, including Arlington which has a violating monitor. These city areas tend to have lower emissions of NO_x and/or VOC, reflecting their small size and the fact that they are more urban and thus have few stationary emission sources of significant size. The cities are included in the area covered by the National Capital Region TPB. EPA is not modifying the Commonwealth's recommendation that these three cities be included in the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS.

Clarke County, VA; Culpepper County, VA; Fauquier County, VA; Frederick County, VA; Rappahannock County, VA; Spotsylvania County, VA; Stafford County, VA; Warren County, VA; Fredericksburg City, VA; Winchester City, VA; Hampshire County, WV; and Jefferson County, WV

None of these areas have a monitor violating the 2015 ozone NAAQS. Additionally, none of these areas are adjacent to a county with a violating monitor. Hampshire County, Winchester City, Rappahannock County, Fredericksburg City, and Clarke County all emit less than 1,000 tpy of total NO_x. The remaining of the counties discussed in this section, Culpeper County, Fauquier County, Frederick County, Spotsylvania County, Stafford County, Warren County, and Jefferson County, each emit less than 4,000 tpy of total NO_x. These 12 areas each have less than 150,000 residents and a very low percentage of their population that commutes to or within a county with a violating monitor. For the reasons listed above, EPA is not modifying Virginia and West Virginia's recommendations that these jurisdictions be designated as attainment/unclassifiable for the 2015 ozone NAAQS.

Based on the above, EPA is not modifying the States' and the District of Columbia's recommendations that the following counties/cities be included in the Washington, DC-MD-VA nonattainment area for the 2015 ozone NAAQS: District of Columbia, Calvert County, MD; Charles County, MD; Frederick County, MD; Prince George's County, MD; Montgomery County, MD; Arlington County, VA; Fairfax County, VA; Loudoun County, VA; Prince William County, VA; Fairfax City, VA; Falls Church City, VA; Manassas City, VA; and Manassas Park City, VA. Furthermore, consistent with the recommendations of Virginia and West Virginia,

Also in line with the States' recommendations, EPA is designating as attainment/unclassifiable for the 2015 ozone NAAQS the following counties: Clarke County, VA; Culpepper County, VA; Fauquier County, VA; Frederick County, VA; Rappahannock County, VA; Spotsylvania County, VA; Stafford County, VA; Warren County, VA; Fredericksburg City, VA; Winchester City, VA; Hampshire County, WV; and Jefferson County, WV.

<u>Summary Analysis of Remaining Cities/Counties Within the Washington-Baltimore-Arlington CSA</u> *Talbot County, MD; St. Mary's County, MD; Dorchester County, MD; Franklin County, PA Berkeley County, WV; and Washington County, MD*

The states did not recommend these counties for inclusion in either the Baltimore or Washington nonattainment areas for the 2015 ozone NAAQS. None of these counties have a monitor violating the 2015 ozone NAAQS nor are they adjacent to a county with a violating monitor. With the exception of Berkeley and Washington Counties, there is only one (or no) large point source in each individual jurisdiction. Although a couple of these counties, such as Washington County, MD and Franklin County, PA, have a similar level of NO_x emissions as counties recommended for nonattainment, they are more remote from the violating monitors. Importantly, they rank low in terms of total population, population densities and population growth. Less than 10% of each of these counites have workers commuting to a county with a violating monitor, indicating that they are not well-integrated with the urban core and with the areas with violating monitors. None of these counties are within one of the two larger CBSA planning areas. EPA is not modifying Maryland's, Pennsylvania's, and West Virginia's recommendations that these counties not be included in either the Washington or Baltimore nonattainment areas and EPA is designating the following counties as attainment/unclassifiable for the 2015 ozone NAAQS: Talbot, St. Mary's, Dorchester, and Washington Counties in Maryland; Franklin County in Pennsylvania; and Berkeley County in West Virginia.