

## Course of Action and Associated Impacts

<u>Determination</u>	<u>Method</u>	<u>Applicable Deadline</u>	<u>Expected Updates</u>	<u>Associated Impacts</u>
<ul style="list-style-type: none"> <li>• <b>Option 1 Selected</b> – revoke 2008 ozone standard for all purposes. (Anti-backsliding requirements would apply.)</li> </ul>	<ul style="list-style-type: none"> <li>• If 2008 standard is revoked, Sussex will be fully attainment, and no need to submit re-designation or maintenance plan.</li> </ul>	<ul style="list-style-type: none"> <li>• Moderate NAAs are to submit attainment plans 5-6 years after NAAQS promulgation. These would need to be submitted by 2020-2021.</li> </ul>	<ul style="list-style-type: none"> <li>• Requires an update to the existing mobile budgets.</li> <li>• EPA issues formal designations based on 2015 Ozone Standard in October 2017.</li> <li>• Updated transportation conformity guidance will be released in November 2017 in regards to the Implementation of the 2015 Ozone Rule.</li> <li>• If determining conformity for the 2015 Ozone Standard NAAQS, baseline year for Baseline Year Test is 2017.</li> </ul>	<ul style="list-style-type: none"> <li>• Updated mobile budgets must be featured in DelDOT's LRTP. Updates could run concurrent with LRTP update (which should be ready for Council adoption and public comment in early 2019.).</li> <li>• Conformity would no longer apply in Sussex or New Castle.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Option 2 Selected</b>- 2008 ozone standard not revoked in any area designated nonattainment for 08' ozone without maintenance plan.</li> </ul>	<ul style="list-style-type: none"> <li>• Submit redesignation &amp; maintenance plans (10 year plan) for Sussex and New Castle County Based on EPA's attainment determination.</li> </ul>	<ul style="list-style-type: none"> <li>• Moderate NAAs are to submit attainment plans 5-6 years after NAAQS promulgation. These would need to be submitted by 2020-2021.</li> </ul>	<ul style="list-style-type: none"> <li>• Requires an update to the existing mobile budgets.</li> <li>• EPA issues formal designations based on 2015 Ozone Standard in October 2017.</li> <li>• Updated transportation conformity guidance will be released in November 2017. In regards to the Implementation of the 2015 Ozone Rule.</li> <li>• If determining conformity for the 2015 Ozone Standard NAAQS, baseline year for Baseline Year Test is 2017.</li> </ul>	<ul style="list-style-type: none"> <li>• Updated mobile budgets must be featured in DelDOT's LRTP. Updates could run concurrent with LRTP update (which should be ready for Council adoption and public comment in early 2019.).</li> <li>• Maintenance for the PM standard will remain in place in New Castle County.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Follow Maine and opt out of the OTR (since whole state will be designated as attainment for '08 standard and '15 standard is not adopted or the NAAQS review period is extended to 10 years) – to opt out of Ozone Transport Region (OTR) provisions associated with nonattainment new source review (NSR) for major new sources and modified stationary sources of ozone precursors.</b></li> </ul>	<ul style="list-style-type: none"> <li>• Submission of a formal restructuring request to leave the OTR would need to be submitted, a public hearing held and 30 day public comment period.</li> </ul>	<ul style="list-style-type: none"> <li>• No new NAAQS means to requirement for attainment SIP. Formal restructuring request.</li> </ul>	<ul style="list-style-type: none"> <li>• Requires an update to the existing mobile budgets.</li> <li>• Updated transportation conformity guidance will be released in November 2017 in regards to the Implementation of the 2015 Ozone Rule.</li> <li>• Revision of SIP would need to occur in regards to the NSR portion of the maintenance plan.</li> <li>• Review of Delaware's attainment history, back trajectories and modeling, NOx and VOC inventories would be a part of the revision review process.</li> </ul>	<ul style="list-style-type: none"> <li>• Updated mobile budgets must be featured in DelDOT's LRTP. Updates could run concurrent with LRTP update (which should be ready for Council adoption and public comment in early 2019.).</li> <li>• Delaware would not be bound by requirements of nonattainment NSR. RACT would remain in place.</li> </ul>

## SIP and Transportation Conformity Work Plan

### Key

- ◆ Completed
- ♦ Initiated
- ♦ Planned (not yet initiated)

### October 2015

- 10/1/15 – EPA finalized revisions for 2015 Ozone Standard proposed rulemaking. ◆

### September 2016

- 9/23/ 16 – DNREC submitted 2015 Ozone Standard designations to EPA which included the following: New Castle County (nonattainment), Kent County (attainment) and Sussex County (attainment). ◆

### March 2017

- 3/9/17 – Presentation given to WILMAPCO at Air Quality Subcommittee (AQS) meeting on the “Implementation of the 2015 Ozone Standard and Related Impacts to Transportation Conformity.” Review of timeline and agency expectations/responsibilities. ◆

### April 2017

- 4/13/17 – Presentation given at Salisbury/Wicomico MPO TAC meeting on the “Implementation of the 2015 Ozone Standard and Related Impacts to Transportation Conformity.” Review of timeline and agency expectations/responsibilities. **Asked to present timeline catered specifically to Sussex County at next meeting in July.** ♦
- 4/27/17 –DNREC Division of Air Quality (DAQ) staff met to discuss SIP submittal and transportation conformity in Sussex County. **Next meeting on June 29<sup>th</sup>.** ♦

### July 2017

- 7/1/17 – **Bond Bill for FY18 issued for appropriation of transportation project funds.**
- 7/5/17 –DNREC to meet with Dover/Kent MPO, WILMAPCO and DelDOT to discuss timeline of events, transportation conformity process, MOVES model inputs and deadlines. ◆
- 7/13/17 – DNREC to meet with Salisbury/Wicomico TAC and present updated SIP and transportation conformity timeline at the request of Salisbury/Wicomico MPO and DelDOT. ◆

## **October 2017**

- **10/3/17** - DNREC to meet with DelDOT to provide status update and deliver updated guidance.

## **November 2017**

- **11/1/17** – EPA is scheduled to issue updated Transportation Conformity Guidance. ♦

## **June 2018**

- **6/1/18** –DNREC to begin process of updating MOVES data (from the 2014 Emissions Inventory data). MPOs (WILMAPCO, Dover/Kent, Salisbury/Wicomico) update regional emissions analysis (conformity analysis) for updated RTP (Long Range Plan) which will be the 2019 RTP.

## **July 2018**

- DNREC to begin process of updating mobile budgets using 2017 National Emissions Inventory (NEI) data.
- **7/3/17** – **Draft Conformity analysis should be ready to be presented to DNREC.** DNREC meets with DelDOT and WILMAPCO and deems WILMAPCO conformity analysis adequate at DelDOT/DAQ Mobile Sources meeting at State Street Commons building. ♦
- **7/19/17** – AQS publicly deems WILMAPCO conformity analysis adequate at Lums Pond joint TAC/AQS meeting. ♦

## **October 2018**

- **10/1/18** –EPA to issue designations based on **2015 Ozone Standard.** ♦
- **10/1/18** – **Infrastructure SIP due no later than 3 years after promulgation of new NAAQS.** ♦

## **September 2018**

- Public comment begins September 13, 2018 for the 2019 RTP. ♦

## **December 2018**

- **12/20/18** - – WILMAPCO TAC recommends approval of the 2019 RTP. Public comment will end in December of 2018. ♦

## **January 2019**

- **1/10/19** - Official Council adoption of 2019 RTP. ♦

## **October 2019**

- **10/1/19 – FHWA/FTA/EPA submittal of 2019 RTP to make adequacy determination. ♦**

## **October 2021**

- **10/2/21 – SIP Attainment Demonstration/Maintenance Plans are due no later than 3 years after official designation under new NAAQs. ♦**