INTER AGENCY CONSULTATION GROUP
Tuesday, September 24, 2013
East-West Gateway Board Room

Members Present:
Michael Coulson, Chair - East-West Gateway Council of Governments
Joe Winkelmann - Missouri Department of Natural Resources
Wendy Vit - Missouri Department of Natural Resources
Mike Henderson - Missouri Department of Transportation
Joe Gray - Illinois Department of Transportation, District 8
Betsy Tracy - Federal Highway Administration, Illinois
Chris Schmitt - Illinois Department of Transportation
Steven (Cody) Brown - U.S. Environmental Protection Agency Region 7 (telephone)
Mike Rogers - Illinois Environmental Protection Agency (telephone)

Others Present:
Emily Wilbur - Missouri Department of Natural Resources

Staff:
Carol Lawrence

1. Call to Order

The meeting of the Inter Agency Consultation Group (IACG) was called to order by Mike Coulson, East-West Gateway Council of Governments (EWG).

2 Conformity Determination Users Guide
- Mike Coulson, East-West Gateway Council of Governments

Hard copies of the June 25, 2013 Conformity Determination Users Guide were distributed. This document satisfies one of the recommendations from the federal Baseline Assessment Review. Copies can be mailed out to other IACG participants, if needed.

3 Maintenance Plan for 1997 Annual $PM_{2.5}$ Standard
- Joe Winkelmann, Missouri Department of Natural Resources

Copies of the proposed for motor vehicle emissions budgets (MVEBs) from the draft Missouri fine particulate ($PM_{2.5}$) Maintenance Plan for the Missouri portion of the St. Louis PM2.5 non-attainment area for the 1997 annual standard were distributed. Earlier, the Missouri Department of Natural Resources (MoDNR) submitted a $PM_{2.5}$ Maintenance Plan to the U.S. Environmental Protection Agency (USEPA) for the 1997 standard. Due to litigation at the federal level on USEPA's transport rule, USEPA did not act on this plan. Now, as a result of memos at the USEPA level, MoDNR is now revising this Maintenance Plan and its MVEBs. The

Maintenance Plan will run from 2015 to 2025. A baseline of 2008 was set which is the mid year in the three years of clean data (2007-2009) showing the 1997 standard was attained. MoDNR has developed 2008 and 2025 MVEBs for the revised Maintenance Plan. The process to develop these MVEBs was described. The 2008 baseline budget was obtained using vehicle fleet numbers from the Department of Revenue, vehicle miles traveled (VMT) on state highways from Missouri Department of Transportation (MoDOT) and local street VMT from the EWG travel demand model. The 2008 baseline budget was then grown out to 2025 using a 1.5 percent annual VMT growth rate. The 2008 and the 2025 MVEBs were developed using the MOtor Vehicle Emissions Simulation (MOVES) model. The table below contains the draft MVEBs for direct PM2.5 and oxides of nitrogen (NO_x), a precursor to PM2.5 formation.

Draft Motor Vehicle Emissions Budgets for the Missouri Portion of the St. Louis Annual PM2.5 NAA		
Pollutants	2008 Motor Source Budgets (tons/year)	2025 Motor Source Budgets (tons/year)
NO_x, as precursor	58,819.58	16,568.44
$PM_{2.5}$	2,179.28	533.34

The 2025 MVEBs are significantly smaller than 2008 despite the growth in VMT because of the Federal Motor Vehicle Emission Standards in place right now and the replacement of older, less fuel efficient, higher emitting vehicles. Emissions should drop off as the vehicle fleet turns over.

This plan should be proposed for public comment soon. Today want to start the discussion for the coordination of these MVEBs. MoDNR is starting the process to let the IACG know about the development of the draft Maintenance Plan and MVEBs. Feel these projections would be a fair method to set MVEBs that will be used in Transportation Conformity Determinations. The proposed budgets will be sent out to IACG participants. If there are any comments or questions about these MVEBs, please let MoDNR know.

After MVEBs are agreed to, they will be part of the Maintenance Plan revision. Public comments will be taken on the revision. After the Maintenance Plan revision is adopted by the Missouri Air Conservation Commission (MACC), MoDNR will submit it to USEPA for MVEB adequacy review (so can use in Conformity Determination) and Plan approval. USEPA can do an Adequacy finding independently of final action on the Maintenance Plan.

Mr. Coulson, EWG, asked how quickly could these MVEBs be found adequate. Mr. Winkelmann, MoDNR, said that MoDNR and USEPA Region 7 are working on that. MVEBs adequacy review process starts, then those MVEBs have to be used in EWG's Conformity

Determination process, even if EWG is in the middle of a Conformity Determination.

Ms. Vit, MoDNR, asked if the IACG needs to go on record okaying these assumptions before MoDNR gets much further along. Mr. Winkelmann, MoDNR, said that this presentation initiated discussion and when the draft Maintenance Plan goes out for public comment, can bring it up again. Mr. Coulson, EWG, said that typically the IACG does not take any action on assumptions unless it is a major issue such as VMT.

Ms. Tracy, Federal Highway Administration (FHWA) IL, asked about the use of 2008 as base year and if there is a point in time when this is not considered to be the most current (as with planning assumptions) as since then there has been a recession, etc. Mr. Winkelmann, MoDNR, said that the 2008 MVEBs will be used to demonstrate conformity for any selected analysis year before 2025. 2008 was selected as a baseline for MVEBs because it is a year with clean monitor data (no violations of the 1997 PM2.5 standard). It is presumed that emissions should continue to go down from that year. The year 2015 was selected as this is year in which MoDNR anticipates USEPA will approve the Maintenance Plan. Ten years is the time frame for a Maintenance Plan so that is why 2025 was used in the development of the second set of MVEBs and selected as the end year of the Maintenance Plan.

Ms. Tracy, FHWA IL, asked if the Illinois Environmental Protection Agency (Illinois EPA) was going through a similar exercise with their MVEBs. Mr. Rogers, Illinois EPA, said that a PM2.5 Maintenance Plan has not been established for the Metro East.

Mr. Winkelmann, MoDNR, asked Mr. Rogers to speak to Ms. Tracy's question concerning the defensibility of using of 2008 input data since a number of years have passed. Mr. Rogers, Illinois EPA, said that the beginning of the maintenance period is the attainment year. Missouri choose 2008 as that year. It is the mid-year of the three year period with clean data. It is a logical place to start.

4 South County Connector Conformity Issues
- Mike Henderson, Missouri Department of Transportation

Consultants for MoDOT and St. Louis County is working on an EIS for the proposed South County Connector projector. MoDOT is reviewing the air quality portion of the Environmental Impact Study (EIS) for the proposed South County Connector project in St. Louis County. MoDOt has identified some issues with the March 2013 "CO or PM2.5 "Hot-Spot" Analysis Considerations for Project Sponsors" (Hot-Spot Considerations). The Hot-Spot Considerations document has been put into practice by MoDOT and MoDOT now has some experience using it.

The first issue relates to the carbon monoxide (CO) section in the Hot-Spot Considerations document. The most recent EIS evaluation from the South County Connector consultants

said that if required, a CO qualitative analysis will be included. The consultants are waiting to see what IACG/MoDOT does. It would be going a little further with the discussion on CO. In his conversations with the consultants and the project sponsors, Mr. Henderson informed them that this would need to be investigated.

It was the opinion of Mr. Henderson that if a sponsor answered "no" to all of the CO criteria questions on pages E-4 and E-5, then should not have to do anything. But the first paragraph on page E-5 of the Hot-Spot Considerations reads as follows.

> If no, a qualitative CO hot-spot analysis required (under 40 CFR 93.123 (a)(2).[footnote]. If yes ,consult EPA's MOVES Project-level CO Modeling Guidance and other applicable guidance for performing the analysis.
> Footnote - A quantitative CO hot-spot analysis can also be done to satisfy this requirement for applicable projects.

The above paragraph is the result of a comment from USEPA Office of Transportation and Air Quality (OTAQ). The footnote is result of OTAQ comment but did not have an explanation. It appears that if answer no to the CO criteria questions, than a qualitative analysis is required. It seems like it should be if all the answers are no, then should not have to do anything. Footnote indicates that a quantitative or a qualitative analysis will have to be done. After researching this, it appears that sponsor will do a qualitative or quantitative analysis no matter how the criteria questions are answered.

Before quantitative analysis process was defined only had to do qualitative analysis. Qualitative analysis is kind of obsolete. Now that quantitative analysis can be done, footnote seems to say that have to do qualitative. Do not think footnote is correct. Mr. Coulson, EWG, said that a qualitative $PM_{2.5}$ hot-spot analysis was performed for the New Mississippi River Bridge.

Mr. Rogers, Illinois EPA, observed that IACG is looking at CO analysis in terms of the guidance that was issued for $PM_{2.5}$ that defined what a project of air quality concern is. The CO hot-spot analysis requirements go way back before the project of air quality concern definition. He asked if this is a stand alone requirement for CO that you have to do something, whether qualitative or quantitative analysis. He added that the Illinois Department of Transportation (IDOT) runs the COSIN model (developed a few years ago) on all projects to determine whether a CO hot-spot analysis needs to be done.

Mr. Henderson, MoDOT, proposed that the footnote be removed from the Hot-Spot Considerations document so there is no confusion. For CO, if have to do analysis one way or the other, would suggest removing the footnote and adding similar language at the start of the CO section. "Qualitative analysis is required no matter what, but quantitative analysis is required if answer yes to following criteria." The IACG needs to review and consider this change and discuss at the next IACG meeting.

Mr. Rogers, Illinois EPA, suggested that before go change anything, need to make sure that check with Mr. Brown of USEPA Region 7 so that he can coordinate with OTAQ and get clarification on their comment and whether proposed change be acceptable to them.

The second issue related to the $PM_{2.5}$ portion of the Hot-Spot Considerations document. The second question on page E-4 reads as follow.

> What is the percentage and AADT of diesel truck traffic of the affected roadways? If diesel truck traffic constitutes greater than 10% of total AADT or least 10,000 trucks consult with IACG.

For the proposed South County Connector project, diesel truck traffic is estimated to be 11.7 percent of total AADT but the truck AADT is estimated to be 5,000 out of 44,000 AADT. When the Hot-Spot Considerations document was being developed by the IACG, the IACG was thinking about what roads would rise to level of AADT and need a hot-spot analysis and they would probably be a major interstate. The projected AADT of the proposed South County Connector project is well under the overall truck traffic AADT of 100,000. MoDOT is bringing this question to the IACG now, even though FHWA has not indicated that there is a problem.

Right now it appears that both items in this section have to be met. Questions the use of "or". If the answer is yes (both criteria) then since there is estimated to be 11.7 percent truck traffic, have to consult with IACG. Interpretation of MoDOT is that because the total truck AADT associated with the proposed South County Connector is so low that it is not a project of air quality concern and does not require a PM2.5 hot-spot analysis. Mr. Henderson recommended to the consultants that it was fine but that the final decision is up to FHWA. If FHWA says that it needs to be discussed at the IACG, they will let MoDOT know and MoDOT will bring it to the IACG for discussion. In this situation thinks FHWA were in agreement that no hot-spot analysis was required. The EIS will be sent to FHWA. The FHWA will review the EIS before they sign the Record of Decision (ROD). If FHWA sees this as a problem they will bring it up before they sign the ROD. It is anticipated that the ROD could be signed sometime next summer.

Mr. Rogers, Illinois Environmental Protection Agency (Illinois EPA), said that he understood that the 10 percent trucks of total AADT and 10,000 truck AADT came from USEPA guidance.

Mr. Henderson, MoDOT, suggested changing the "or" in the second sentence to "and". Mr. Rogers, Illinois EPA, added that it may necessary to clarify that "or" was to be an alternative as the number of interest is the 10,000 truck AADT. Changing "or" to "and" in that sentence is something for everyone to consider before the next IACG meeting. Could propose to revise document . Mr. Coulson, EWG, suggested changing the "or" in the second sentence to "and/or".

Ms. Tracy, FHWA IL, said that it is good that IACG is looking at this now with a real life example to vet through. Observed that if substituted "and/or" for "or", would not MoDOT be in the same position as they are now. She asked where this particular project falls. Mr. Henderson, MoDOT, said that the estimated 11.7 percentage of truck AADT would indicate a hot-spot is needed but the actual truck AADT is estimated to be 5,000. Feel comfortable that could come before IACG and get everyone to be in agreement that this project is not a project of air quality concern. If it is, the sponsor is going to have to hire a consultant at extreme cost to do a hot-spot analysis which would add to the cost of the project.

Mr. Brown of USEPA Region 7 was asked to present issues and options to OTAQ and ask for clarification. For CO, if have to do analysis one way or the other, would suggest removing the footnote and adding similar language at the start of the CO section such as "Qualitative analysis is required no matter what, but quantitative analysis is required if answer yes to following criteria." For $PM_{2.5}$ section the way the second question is framed now, FHWA is going to have to make the call on EIS documents. Mr. Brown, USEPA Region 7, said that he would check with OTAQ and see if these revisions are acceptable.

Mr. Henderson, MoDOT, observed that there will be very few projects which will actually require a hot-spot analysis.

These items will be discussed again at the next IACG meeting.

5 Other Business

Mr. Winkelmann, MoDNR, announced that USEPA is moving forward with the adequacy review for the 2015 volatile organic compound and NO_x MVEBs from Missouri's Early Progress Plan for the 2008 eight-hour ozone standard. USEPA is taking comments through October 4, 2013. MoDNR has been working with Steven "Cody" Brown of USEPA Region 7. For more information on the adequacy process go to www.epa.gov/otaq/stateresources/transconf.

EWG distributed copies of the Executive Summary of the Transportation Conformity Particulate Matter Hot-Spot Air Quality Modeling report. This project was conducted for the Illinois Center for Transportation and IDOT. The initial purpose of the project was to identify Illinois-specific threshold values for projects of potential air quality concern and to develop a technique that IDOT could use to determine if projects were of concern. After many MOVES runs and pilot projects it was found that the many factors involved in PM2.5 hot-spot analysis make it a very site specific process and threshold values could not be established.

There being no other business, the meeting of the Inter Agency Consultation Group was adjourned.