INTER AGENCY CONSULTATION GROUP

Tuesday, June 24, 2014
East-West Gateway Board Room

Members Present:
Michael Coulson, Chair - East-West Gateway Council of Governments
Joe Winkelmann - Missouri Department of Natural Resources
Mike Henderson - Missouri Department of Transportation
Joe Gray - Illinois Department of Transportation, District 8
Mike Rogers - Illinois Environmental Protection Agency (telephone)

Others:
Sara Chappell - Illinois Department of Transportation
Curtis Jones - Illinois Department of Transportation
Kevin Jemison - Illinois Department of Transportation, District 8

Staff:
Lubna Shoaiib       Jason Lange       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. Status Report - Comment Period for Draft Conformity Determination and Draft FY 2015-2018 Transportation Improvement Program
   - Jason Lange, East-West Gateway Council of Governments

Five of the seven public open houses for the draft Conformity Determination and draft Transportation Improvement Program (TIP) have been held. To date, 78 people have attended, primarily project sponsors, consultants and citizens. Missouri project sponsors are required to attend the open houses. Two more meeting are scheduled this week. There is a meeting Wednesday at the Schaflly Branch library in the City of St. Louis and one Thursday at the Metro East Park and Recreation District office in Collinsville, IL. The comment period ends on July 3. Once the comment period ends, EWG staff will compile the comments received and submit them, along with the Conformity Determination and the TIP, to the EWG Board of Directors. The Board is to take final action at their July 30 meeting. A few comments have been received. The majority have been supportive and have a project-specific focus. Mr. Jones, Illinois Department of Transportation (IDOT), asked if there were any outstanding comments from the open house held in Shiloh. Mr. Lange, EWG, said that the open house was good and that five to six people attended (IDOT, Metro, nearby communities and a consultant).

Mr. Coulson, EWG, asked if the Conformity Determination and the TIP are approved by the Board on July 30, can a OneDOT letter be anticipated 60 days after that. Mr. Lange, EWG, said that after Board action on July 30, EWG will quickly turn around and submit documents to Federal Highway Administration (FHWA), Missouri Department of Transportation (MoDOT) and IDOT. Hopefully there will be a response by the middle of September. The federal agencies have been trying to streamline the process. Mr. Henderson, MoDOT, observed that for the FY 2014-2017 TIP, the OneDOT approval letter was dated September 30, 2013. Takes time because have to wait for U.S. Environmental Protection Agency (USEPA) to concur with the Conformity Determination finding.
made by EWG. USEPA has 30 days to review the Conformity Determination. Last year they took the full 30 days to review the Conformity Determination after FHWA sent it to them. The main thing is to have TIP approved before October 1.

Mr. Lange, EWG, pointed out that there could be no significant impact if the OneDOT letter is not received by October 1 but it would be good to have the letter before that data. EWG can continue to operate until the current FY 2014-2017 TIP. It would affect those projects new to the TIP. Mr. Henderson, MoDOT, added that MoDOT has steps in place in case there is a delay past October 1 in the receipt of the OneDOT letter.

   - Joe Winkelmann, Missouri Department of Natural Resources

Missouri Department of Natural Resources (MoDNR) submitted to USEPA Region 7 a Maintenance Plan and Redesignation Request for the 1997 annual PM2.5 standard for the Missouri portion of the St. Louis PM2.5 non-attainment area. It is the understanding of MoDNR that this Plan and Request are getting close to approval. USEPA approval could occur some time from August - October 2014. When the Plan is approved at the federal level, the motor vehicle emission budgets (MVEB) in the Plan for an analysis year prior to 2025 (2008 baseline) and 2025 analysis year will also be approved. For future PM2.5 Conformity Determinations for the Missouri side, will use Action/Budget test instead of current Action/2002 Baseline emissions inventory test. USEPA is planning to do a MVEB adequacy finding and Plan approval at the same time.

Mr. Coulson, EWG, said that the Missouri PM2.5 2008 and 2025 MVEBs would be used in Conformity Determinations work in 2015.

Mr. Henderson, MoDOT, asked about the status of the attainment/non-attainment designation recommendations for the 2012 PM2.5 standard. Mr. Winkelmann, MoDNR, said that Missouri recommended to USEPA that all of the state be classified as attainment based on clean monitoring data. In September, MoDNR is expecting a letter from USEPA with their proposed designation(s) decisions. If USEPA does not accept Missouri’s recommendation, then Missouri has 120 days to respond with additional technical data to demonstrate that the state’s recommendation should be used. It is hard to say how USEPA will decide. Missouri meets the 2012 standard based on monitoring data. There is a question if Missouri is contributing to the Illinois side. Technical demonstration conducted by MoDNR shows that Missouri does not contribute much but believe that Illinois data shows that the East St. Louis monitor may be affected by Missouri sources.

Mr. Henderson, MoDOT, asked how Conformity would be different if Missouri side is found in attainment of 1997 standard. Mr. Winkelmann, MoDNR, said that it will be easier to met the obligation for transportation conformity determination for the 1997 standard for the Missouri side. It is unclear what will happen with designations for the 2012 standard. This is a question for USEPA.

   - Lubna Shoaib, East-West Gateway Council of Governments

USEPA is expected to release a new version of the MOtor Vehicle Emissions Simulation (MOVES) model some time in July 2014. MOVES is the official air quality emission modeling software for USEPA. Required to use this model for all on-road emissions air quality modeling with software. Right now, current latest MOVES version is MOVES2010B. MOVES 2014 will be a major update and is to include the benefits of the TIER 3 rule as well as impacts of other federal rule-making promulgated since the last MOVES update. It also uses new emissions data and has new software features that users have requested. USEPA has not indicated what kind of news emissions data will be in the update.
Ms. Shoaib observed that with these changes unsure what advantages/disadvantages there will be in using MOVES 2014 to produce emissions estimates. After MOVES2014 is released, she plans to do sensitivity analyses on it using data inputs used in the Conformity Determination for the 2015-2018 TIP and see what the differences are. Will obtain the latest planning/model assumptions from MoDNR and Illinois Environmental Protection Agency (Illinois EPA). This will be a way to identify issues or challenges early and work our way through them.

Mr. Coulson, EWG, asked if there will be an 18 month grace period to begin to use MOVES2014. Ms. Shoaib, EWG, said that it will take from one year to 18 months to install the model so there is time to evaluate what might need to occur.

Ms. Shoaib, EWG, asked what would happen if the new MOVES model shows problem in meeting Conformity tests. Mr. Coulson, EWG, would have to revisit motor vehicle emissions budgets (MVEBs). Mr. Winkelmann, MoDNR, pointed out that MVEBs have to be done as part of a State Implementation Plan (SIP) action and there are margins of safety in the SIP. Would anticipate that there would be high level meetings to see what kind of SIP action could take that would allow State(s) to revisit budgets and margin of safety(s) along with an explanation of why it is appropriate to use that margin of safety to revise MVEBs.

Mr. Winkelmann, MoDNR, said that the St. Louis marginal non-attainment area (Missouri and Illinois) has until December 2015 to demonstrate attainment of the 2008 eight-hour ozone standard or be re-classified to moderate. Such a bump-up would require an Attainment Demonstration SIP with round of control strategies which would probably require setting of MVEBs. It is possible could make the 2008 standard based on monitoring data.

He pointed out that another thing to keep in mind is that USEPA is under a Court Order to propose revised eight-hour ozone standard by the end of 2014 with the standard finalized by end of 2015. Proposed standard is anticipated to be in the range of 60 - 70 parts per billion (ppb). To put that in perspective, there is no monitor in the State of Missouri that would be in attainment of an ozone standard set at 60 or 65 ppb. A standard in 60 - 70 ppb range would put 65 - 75 percent of the U.S.(based on population) in non-attainment.

Mr. Coulson, EWG, observed that after the revision to the standard is proposed, there will be probably be lawsuits, so implementation could drag on for a while.

5. Other Business

Ms. Shoaib, EWG, asked Mr. Henderson about the May 2014 ASHTO Air Quality Peer Review for State Department of Transportations in Washington, D.C. Mr. Henderson, MoDOT, said that many of the topics discussed there had been discussed here. There was a discussion about Conformity and coarse particulate matter (PM10) but that is not an issue here. He did ask about Congestion Mitigation Air Quality (CMAQ) performance measures. According to Cecilia Ho of Federal Highway Administration (FHWA) in Washington, D.C., performance measures guidance has not been released and states should wait until that occurs.

Mr. Coulson, EWG, suggested that performance measures it could be a topic for a future IACG meeting. Mr. Henderson, MoDOT, added that the federal level is interested in the best improvements in air quality for the monies expended. He added that it is possible that the format of the CMAQ progress report may change.

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