



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 28, 2012

Dennis M. McLerran, Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

RE: Tacoma-Pierce County Nonattainment Area SIP revision

Dear Mr. McLerran:

As the Governor's designee for the State Implementation Plan (SIP), I am asking EPA to establish a motor vehicle emissions budget for the Tacoma-Pierce County Nonattainment Area through EPA rulemaking as described in 93.109 (c)(5) of the conformity rule and the preamble of the Transportation Conformity Rule Restructuring Amendments (77 FR 14982, Mar 14 2012).

*Today, EPA is clarifying that any nonattainment area that EPA determines has air quality monitoring data that meet the requirements of 40 CFR parts 50 and 58 and that show attainment of a NAAQS—a "clean data" area—can choose to satisfy the regional conformity test requirements by using on-road emissions from the most recent year of clean data as the budget(s) for that NAAQS rather than using the interim emissions test(s) per 40 CFR 93.119. The area may do this if the following are true:*

- *The state or local air quality agency requests that budgets be established by the EPA determination of attainment (Clean Data) rulemaking for that NAAQS, and EPA approves the request; and,*
- *The area has not submitted a maintenance plan for that NAAQS and EPA has determined (through the Clean Data rulemaking) that the area is not subject to the CAA reasonable further progress and attainment demonstration requirements for the relevant NAAQS.*

On September 4, 2012 EPA made a Clean Data Determination for the Nonattainment Area which suspended most SIP planning requirements. The Clean Data Determination provided the



Washington State Department of Ecology (Ecology) with the option of defining a motor vehicle emissions budget (MVEB) based on the most recent year of clean data for determining the conformity of regional transportation planning with the SIP.

We request that EPA approve the MVEB before April of 2013 so that the Puget Sound Regional Council can use the approved MVEB while updating their long range transportation plan. The Puget Sound Regional Council held an interagency consultation on the MVEB with Ecology, Federal Highway Administration, Federal Transit Administration, Washington Department of Transportation, and the Puget Sound Clean Air Agency.

Under EPA's transportation conformity rule, the MVEB is the on-road emissions inventory for the most recent year of clean data. Ecology and the Puget Sound Regional Council developed the MVEB based on the 2011 emissions motor vehicle emissions inventory. The MVEB and supporting documentation are enclosed. The MVEB replaces the use of interim emissions tests for conformity once EPA approves it.

If you have any questions on this submittal, please contact Richelle Perez at (360) 407-7528 or via email at [richelle.perez@ecy.wa.gov](mailto:richelle.perez@ecy.wa.gov) or Doug Schneider at (360) 407-6874 or via email at [doug.schneider@ecy.wa.gov](mailto:doug.schneider@ecy.wa.gov).

Sincerely,



Ted Sturdevant  
Director

Enclosures

cc: Jeff Hunt, EPA (w/enclosures)  
Richelle Perez, SIP Planner (w/o enclosures)  
Doug Schneider, SIP Planner (w/o enclosures)  
Margo Thompson, SIP Planner (w/o enclosures)  
Mike Boyer, Environmental Specialist (w/o enclosures)  
Brett Rude, Environmental Specialist (w/o enclosures)  
Nancy Pritchett, Rules and Planning Unit Supervisor (w/o enclosures)  
Julie Oliver, Section Manager, Program Development (w/o enclosures)  
Jeff Johnston, Section Manager, Science and Engineering (w/o enclosures)  
Stu Clark, Program Manager, Air Quality Program (w/o enclosures)  
Records file (w/ enclosures)