

TABLE 1.—MILWAUKEE'S REVISED MOTOR VEHICLE EMISSIONS INVENTORIES

Area	2007	
	VOC (tpd)	NO _x (tpd)
Milwaukee Severe Area:		
MOBILE6 Emissions	30.34	69.32
Safety Margin	1.86	2.08
Inventory Value	32.20	71.40
Sheboygan Maintenance Area:		
MOBILE6 Emissions	2.86	5.62
Safety Margin	0.43	0.78
Inventory Value	3.24	6.40

V. Are the Revised MOBILE6 Inventories Consistent With Wisconsin's One-Hour Attainment Demonstration?

Wisconsin's attainment demonstration used photochemical grid modeling in the absolute sense. Absolute modeling refers to uses the output from a model to compare directly against a standard. For one-hour ozone, this means that the daily peak one-hour concentration predicted in every grid cell by the model would be compared to a ozone standard concentration of 124 parts per billion (ppb). This is best represented by the deterministic approach described in the 1996 Guidance on Use of Modeled Results to Demonstrate Attainment of the Ozone NAAQS, EPA, June 1996. That guidance also describes a statistical approach which allows a specific number of exceedances of the standard. However, final attainment is still determined in an

absolute sense by comparing a predicted concentration with the one-hour standard value of 124 ppb. EPA has articulated its policy regarding the use of MOBILE6 in SIP development in its "Policy Guidance on the Use of MOBILE6 for SIP Development and Transportation Conformity"³ and "Clarification of Policy Guidance for MOBILE6 in Mid-course Review Areas."⁴ This policy requires that new MOBILE6 MVEBs in areas that demonstrated attainment with absolute modeling meet two conditions. First, the new MOBILE6 based mobile source inventories are compared to the MOBILE5 based inventories for the attainment year. If the MOBILE6 mobile emissions are less than or equal to the MOBILE5 emissions, then the SIP continues to demonstrate attainment. Second, EPA's policy guidance requires the State to consider whether growth and control strategy assumptions for non-motor vehicle sources (*i.e.*, point, area, and non-road mobile sources) are still accurate at the time the State developed submittal.

Consistent with this policy guidance, Wisconsin's updated MOBILE6 inventories were equal to the MOBILE5 attainment demonstration inventories for the Milwaukee and Sheboygan areas. It should be noted that Wisconsin used the latest planning assumptions in developing of the updated inventories. Wisconsin reviewed the growth and control strategy assumptions for non-motor vehicle sources, and concluded that these assumptions continue to be valid and support the one-hour Ozone Attainment Demonstration.

In summary, Wisconsin's January 31, 2003, submittal satisfies the conditions outlined in EPA's MOBILE6 Policy guidance, and demonstrates that the new levels of motor vehicle emissions calculated using MOBILE6 continue to support achievement of the projected attainment of the one-hour Ozone NAAQS by the attainment date of 2007.

VI. Are Wisconsin's Motor Vehicle Emissions Budgets Applicable?

Table 2 below summarizes Wisconsin's revised 2007 MVEBs contained in the January 31, 2003, submittal. The State developed MVEBs using the latest planning assumptions, including updated vehicle registration data, VMT, speeds, fleet mix, and SIP control measures. The Wisconsin submittal met all applicable requirements and EPA is proposing to approve all of these budgets.

TABLE 2.—2007 MOTOR VEHICLE EMISSIONS BUDGETS

Area	2007	
	VOC (tpd)	NO _x (tpd)
Milwaukee Severe Area ...	32.20	71.40
Sheboygan Maintenance Area	3.24	6.40

Table 3 below summarizes the Sheboygan maintenance area's 2007 and new 2012 emissions inventory contained in the January 31, 2003, submittal:

TABLE 3.—SHEBOYGAN MAINTENANCE AREA'S EMISSIONS INVENTORY

Source	2007		2012	
	VOC (tpd)	NO _x (tpd)	VOC (tpd)	NO _x (tpd)
Point	3.4	25.0	3.7	26.9
Area	7.2	2.2	7.4	2.2
Non-Road	2.7	6.0	2.5	6.0
Mobile	3.2	6.4	2.0	4.0
Total	16.5	39.5	15.6	39.1

³Memorandum, "Policy Guidance on the Use of MOBILE6 for SIP development and Transportation Conformity," issued January 18, 2002. A copy of

this memorandum can be found on EPA's Web site at <http://www.epa.gov/otaq/transp/traqconf.htm>.

⁴Memorandum, "Clarification of Policy Guidance for MOBILE6 SIPs in Mid-course Review Areas,"

issued February 12, 2003. A copy of this memorandum can be found on EPA's Web site at <http://www.epa.gov/otaq/transp/traqconf.htm>.