

### 1. Emissions Inventories—Attainment Year and Projections

EPA's interpretations of the CAA section 175A maintenance plan requirements are generally provided in the General Preamble (see 57 FR 13498, April 16, 1992) and the September 4, 1992, Calcagni Memorandum referenced above. Under our interpretations, areas seeking to redesignate to attainment for CO may demonstrate future maintenance of the CO NAAQS either by showing that future CO emissions will be equal to or less than the attainment year emissions or by

providing a modeling demonstration. For the Fort Collins area, the State selected the emissions inventory approach for demonstrating maintenance of the CO NAAQS.

The maintenance plan that the Governor submitted on August 9, 2002, includes comprehensive inventories of CO emissions for the Fort Collins area. These inventories include emissions from stationary point sources, area sources, non-road mobile sources, and on-road mobile sources. The State selected 1992 as the year from which to develop the attainment year inventory

and included interim-year projections out to 2015. More detailed descriptions of the 1992 attainment year inventory and the projected inventories are documented in the maintenance plan in Part II, Chapter 2, section A, Table 2 and Table 3, and in the State's TSD. The State's submittal contains detailed emission inventory information that was prepared in accordance with EPA guidance. Summary emission figures from the 1992 attainment year, the interim projected years, and the final maintenance year of 2015 are provided in Table III-1 below.

TABLE III-1.—SUMMARY OF CO EMISSIONS IN TONS PER DAY FOR FORT COLLINS

	1992	1998	2005	2010	2015
Point Sources .....	0.7	0.4	0.5	0.6	0.6
Area Sources .....	13.8	13.9	4.5	4.7	4.8
Non-Road Mobile Sources .....	9.4	10.5	12.4	14.2	17.0
On-Road Mobile Sources .....	94.6	80.9	91.3	75.0	71.4
Total .....	118.4	105.7	108.8	94.5	93.9

### 2. Demonstration of Maintenance—Projected Inventories

As we noted above, total CO emissions were projected forward by the State for the years 1998, 2005, 2010, and 2015. We note the State's approach for developing the projected inventories follows EPA guidance on projected emissions and we believe they are acceptable.<sup>3</sup> The projected inventories show that CO emissions are not estimated to exceed the 1992 attainment level during the time period 1992 through 2015 and, therefore, the Fort Collins area has satisfactorily demonstrated maintenance.

We note in Table III-1 there are significant reductions projected in years 2005, 2010, and 2015 for area sources. The majority of the area source projected reductions are from the State's estimates for less woodburning in future years. We believe this projection of less woodburning is reasonable in view of the information provided in Attachment 3 of the State's TSD. Attachment 3 is entitled "Outdoor Air Quality Survey, Spring 2002, Report: City of Fort Collins" and includes survey data with special emphasis on woodburning and woodsmoke. Further information on these projected emissions may also be found in the State's TSD.

### 3. Changes to Regulation No. 11 and Regulation No. 13 for the Maintenance Period

As described in Part II, Chapter 2, Section B, of the maintenance plan, as of January 1, 2004, the Basic I/M program (of Regulation No. 11) and the oxygenated fuels program (Regulation No. 13) will not be a part of the Federally enforceable SIP for the Fort Collins area. No CO emission reduction credit for these programs has been taken for the years 2005, 2010, and 2015 in the maintenance demonstration. The mobile source emissions presented in Table III-1 also reflect the elimination of these programs for the Fort Collins area.

The State performed an analysis (Section of the State's TSD entitled Fort Collins Urban Growth Area Carbon Monoxide Maintenance Plan Mobile Source Carbon Monoxide Emissions Inventories") and determined that both the Basic I/M and the oxygenated fuels program could be eliminated for the Fort Collins area without jeopardizing maintenance of the CO NAAQS. This analysis was performed using EPA's MOBILE6 emission factor model and the latest transportation and planning data from the North Front Range Transportation and Air Quality Planning Council's (NFRTAQPC) 2025 transportation plan. The methodology and analysis were reviewed by us and we have determined they are acceptable. The results of the modeling were presented in the revised maintenance plan's "Table 2," and are also included in our Table III-1 above. Based on our

review of the State's analysis, we agree that the Fort Collins area continues to demonstrate maintenance of the CO NAAQS and we approve the elimination of the Basic I/M program and oxygenated fuels program for Larimer County and the Fort Collins area.

### 4. Monitoring Network and Verification of Continued Attainment

Continued attainment of the CO NAAQS in the Fort Collins area depends, in part, on the State's efforts to track indicators throughout the maintenance period. This requirement is met in two sections of the Fort Collins CO maintenance plan; Part II, Chapter 2, sections E and F.2.

In Part II, Chapter 2, section E the State commits to continue the operation of the CO monitor (in Section E, the State commits to site a second CO monitor) in the Fort Collins area and to annually review this monitoring network and make changes as appropriate.

In Part II, Chapter 2, section F.2, the State commits to track mobile sources' CO emissions (which are the largest component of the inventories) through the ongoing regional transportation planning process that is done by NFRTAQPC in coordination with the Colorado Department of Transportation (CDOT), the Colorado Air Pollution Control Division (APCD), the AQCC, and EPA.

Based on the above, we are approving these commitments as satisfying the relevant requirements and we note that

<sup>3</sup> Use of Actual Emissions in Maintenance Demonstrations for Ozone and Carbon Monoxide (CO) Nonattainment Areas", signed by D. Kent Berry, Acting Director, Air Quality Management Division, November 30, 1993.