

2. Describe any assumptions that you used.

3. Provide any technical information and/or data you used that support your views.

4. If you estimate potential burden or costs, explain how you arrived at your estimate.

5. Provide specific examples to illustrate your concerns.

6. Offer alternatives.

7. Make sure to submit your comments by the comment period deadline identified.

8. To ensure proper receipt by EPA, identify the appropriate regional file/rulemaking identification number in the subject line on the first page of your response. It would also be helpful if you provide the name, date, and **Federal Register** citation related to your comments.

## II. Background

In November of 1999, EPA issued two memoranda<sup>1</sup> to articulate its policy regarding states that incorporated MOBILE5-based interim Tier 2 standard<sup>2</sup> benefits into their SIPs and MVEBs. Although these memoranda primarily targeted certain serious and severe ozone nonattainment areas, EPA has implemented this policy in all other areas that have made use of federal Tier 2 benefits in air quality plans from EPA's April 2000 MOBILE5 guidance, "MOBILE5 Information Sheet #8: Tier 2 Benefits Using MOBILE5." All states whose attainment demonstrations or maintenance plans include interim MOBILE5-based estimates of the Tier 2 standards were required to make a commitment to revise and resubmit their MVEBs within either one or two years of the final release of MOBILE6 in order to gain SIP approval.

On December 26, 2000, Illinois submitted a revision to the One-Hour Ozone Attainment Demonstration SIP for the Chicago severe ozone area. This SIP revision included, among other things, revised MVEBs using interim MOBILE5-based estimates of the Tier 2 standards and an enforceable commitment to revise the attainment demonstration using the MOBILE6 model, including MVEBs, within two years of the release of the model.

<sup>1</sup> Memoranda, "Guidance on Motor Vehicle Emissions Budgets in 1-Hour Ozone Attainment Demonstrations," issued November 3, 1999, and "1-Hour Ozone Attainment Demonstrations and Tier 2/ Sulfur Rulemaking," issued November 8, 1999. Copies of these memoranda are on EPA's Web site at <http://www.epa.gov/otaq/transp/traqconf.htm>.

<sup>2</sup> The final rule on Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements ("Tier 2 standards") for passenger cars, light trucks, and larger passenger vehicles was published on February 10, 2000 (65 FR 6698).

Additional information on EPA's final approval of Illinois' December 26, 2000 submittal is in the November 13, 2001 **Federal Register** (66 FR 56931).

EPA officially released the MOBILE6 motor vehicle emissions factor model on January 29, 2002 (67 FR 4254). Thus, the effective date of that **Federal Register** notice constituted the start of the two year time period in which Illinois was required to revise its One-Hour Ozone Attainment Demonstration SIP using the MOBILE6 model. Illinois was required to submit this SIP revision to EPA by January 29, 2004.

## III. What Is MOBILE6?

MOBILE is an EPA emissions factor model for estimating pollution from on-road motor vehicles in states outside of California. MOBILE calculates emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from passenger cars, motorcycles, buses, and light-duty and heavy-duty trucks. The model accounts for the emission impacts of factors such as changes in vehicle emission standards, changes in vehicle populations and activity, and variation in local conditions such as temperature, humidity, fuel quality, and air quality programs.

MOBILE is used to calculate current and future inventories of motor vehicle emissions at the national and local level. These inventories are used to make decisions about air pollution policies and programs at the local, state and national level. Inventories based on MOBILE are also used to meet the federal Clean Air Act's SIP and transportation conformity requirements.

MOBILE6 is the first major update of the MOBILE model since 1993. The MOBILE model was first developed in 1978. It has been updated many times to reflect changes in the vehicle fleet and fuels, to incorporate EPA's growing understanding of vehicle emissions, and to cover new emissions regulations and modeling needs. Although some minor updates were made in 1996 with the release of MOBILE5b, MOBILE6 is the first major revision to MOBILE since MOBILE5a was released in 1993.

## IV. What Is the Purpose and Content of Illinois' Submittal?

To address its enforceable commitment made in the December 26, 2000, Attainment Demonstration SIP revision, the State submitted a requested SIP revision on April 11, 2003, which revises the 2005 and 2007 motor vehicle emissions inventories and the 2005 and 2007 MVEBs using the MOBILE6 model. The April 11, 2003, submittal 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 for the Chicago area.

## V. What Are the Revised MOBILE6 Inventories?

Table 1 below summarizes the revised motor vehicle emissions inventories in tons per summer day (tpd). The State developed these revised inventories using the latest planning assumptions, including updated vehicle registration data, vehicle miles traveled (VMT), speeds, fleet mix, and SIP control measures. EPA is approving these revised 2005 and 2007 motor vehicle emissions inventories.

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

	2005 VOC	2007	
		VOC	NO <sub>x</sub>
Chicago Severe Area	151.11	127.42	280.40

## VI. Are the Revised MOBILE6 Inventories Consistent With Illinois' One-Hour Ozone Attainment Demonstration?

Illinois' attainment demonstration used photochemical grid modeling. For one-hour ozone, the daily peak one-hour concentration predicted in every grid cell by the model was compared to the 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"<sup>3</sup> and "Clarification of Policy Guidance for MOBILE6 in Mid-course Review

<sup>3</sup> Memorandum, "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>.