

TABLE 1.—COMPARISON OF PENNSYLVANIA'S MOBILE5 AND REVISED MOBILE6-BASED HIGHWAY MOBILE EMISSIONS INVENTORIES FOR THE PHILADELPHIA 1-HOUR OZONE ATTAINMENT PLAN

Philadelphia 5-county area	1990		2005	
	VOC (tpd)	NO _x (tpd)	VOC (tpd)	NO _x (tpd)
MOBILE5-based inventory	187.90	158.33	60.18	77.46
MOBILE6-based (revised) inventory	239.95	252.93	79.69	144.73

EPA's articulated its policy regarding its policy on the use of MOBILE6 modeling for purposes of SIP development in several guidance documents entitled "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

Pennsylvania's January 17, 2003 SIP revision includes an explanation of the differences between the MOBILE5 and MOBILE6-based inventories. The SIP also provides a comparison of the relative reduction, by percentage, between the 1990 and 2005 inventories generated using the two different versions of the models to ensure that the approved Philadelphia 1-hour ozone attainment demonstration will continue to demonstrate attainment by 2005. The methodology for this relative reduction comparison consists of comparing the revised MOBILE6 baseline and attainment case inventories, by pollutant, with the previously approved (66 FR 54143) MOBILE5 inventory totals for the 5-county Philadelphia area to determine if attainment can still be predicted by the attainment date. The Commonwealth then compared these relative reduction percentages for the MOBILE5 versus MOBILE6 inventories for 1995 and 2005. It should be noted that since the latest available planning assumptions were used the revised, MOBILE6-based modeling, this relative reduction comparison is not an exact comparison of only the differences

between the different versions of the MOBILE models.

Pennsylvania's relative reduction comparison shows that the reduction in VOC emissions, on a percentage basis, is greater in the revised MOBILE 6-based inventories than in the previously approved MOBILE5 inventories. However, there is a slight increase, on a percentage basis, in NO_x in the revised MOBILE6-based inventories compared to the previous MOBILE5 inventories. The Commonwealth argues that the benefit of additional reduction in VOCs outweighs the slight NO_x increase—which the Commonwealth justifies quantitatively by using a 1.3 to 1 VOC to NO_x substitution ratio to weigh directly the actual VOC to NO_x emissions resultant from the MOBILE5 and MOBILE6-based inventories. This method of weighting VOC versus NO_x emissions shows that the increased reductions in VOC emissions outweigh the increase in NO_x emissions demonstrated by the MOBILE6-based inventories. Pennsylvania's choice of VOC to NO_x substitution ratios for this comparison stems from its use in New Source Review emission trading in the Philadelphia ozone nonattainment area.

EPA's relevant policy guidance also required the Commonwealth to consider whether growth and control strategy assumptions for other sources (*i.e.*, point, area, and non-road mobile sources) were still accurate at the time the revised MOBILE6 budget SIP submission (*i.e.*, January 2003). Pennsylvania's SIP revision states that growth and control strategy assumptions

for these other emissions sources have been reevaluated, with the conclusion that these assumptions for growth and control strategies continue to be valid for the Philadelphia 1-hour ozone attainment demonstration.

Pennsylvania's January 17, 2003 SIP revision 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 1-Hour Ozone NAAQS by the attainment date of 2005 for Pennsylvania portion of the Philadelphia-Wilmington-Trenton area.

The Revised Mobile Budget

For Pennsylvania's Philadelphia area attainment plan, the mobile budgets are the on-road components of VOC and NO_x emissions of the 2005 attainment inventories. Table 2 below summarizes Pennsylvania's revised budgets contained in the January 17, 2003 submittal. These budgets were developed using the latest planning assumptions, including 1999 vehicle registration data and VMT. Because Pennsylvania's January 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 1-Hour Ozone NAAQS, EPA is taking rulemaking action to approve this mobile emissions budget.

TABLE 2.—PHILADELPHIA MOTOR VEHICLE EMISSIONS BUDGET

Type of Control Strategy SIP	VOC (tpd)	NO _x (tpd)
1-Hour ozone attainment demonstration SIP	79.69	144.73

III. Final Action

Pennsylvania has adequately demonstrated to EPA that its 1-hour

attainment demonstration SIP for the Philadelphia area (as revised in by the January 2003 MOBILE6-based highway

emissions inventory) will continue to demonstrate attainment of the ozone NAAQS with the incorporation of the

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>.