

TABLE 1.—COMPARISON OF THE MOBILE5 AND MOBILE6-BASED HIGHWAY MOBILE EMISSIONS FOR THE DELAWARE PORTION OF THE PHILADELPHIA-WILMINGTON-TRENTON 1-HOUR OZONE ATTAINMENT PLAN

	Kent County		New Castle County		Two-county totals	
	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>
<b>MOBILE6-Based Estimates (tpd)</b>						
1990 Base Year .....	11.84	9.24	42.16	31.03	54.00	40.27
2005 Attainment Year .....	5.14	8.42	15.08	21.28	20.22	29.70
Percent Reduction .....	56.6	8.9	64.2	31.4	62.6	26.2
<b>MOBILE5-Based Estimates (tpd)</b>						
1990 Base Year .....	12.89	10.62	34.07	27.04	46.96	37.66
2005 Attainment Year .....	4.84	7.90	14.76	22.92	19.60	30.83
Percent Reduction .....	62.5	25.6	56.7	15.2	58.3	18.1

EPA's articulated its policy regarding the use of MOBILE6 modeling for purposes of SIP development in guidance documents entitled "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 Areas."<sup>4</sup>

Delaware's September 2, 2003 SIP revision submittal includes an explanation of the differences between the MOBILE5 and MOBILE6-based inventories. The submittal also provides a comparison of the relative reduction, by percentage, between the 1990 and 2005 inventories generated using the two different versions of the model to ensure that the approved Philadelphia area 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 MOBILE5 inventory totals for the Delaware portion of Philadelphia area to determine if attainment can still be predicted by the attainment date. Delaware then compared these relative reduction percentages for the MOBILE5 versus MOBILE6 inventories for 1990 and 2005. As indicated in Table 1, the State's relative reduction comparison for the two-county Delaware portion of the

Philadelphia area shows that the reductions in NO<sub>x</sub> and VOC emissions, on a percentage basis, are greater in the revised MOBILE 6-based inventories than in the previously approved MOBILE5-based inventories. It should be noted that because the latest available planning assumptions (e.g., 2002 data for vehicle registration, vehicle miles traveled (VMT) and speeds) were also used in the revised MOBILE6-based modeling, this relative reduction comparison is not a strict comparison of the differences resulting solely from the use of the MOBILE6 versus MOBILE5 version of the MOBILE model.

EPA's relevant policy guidance also requires Delaware 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 of the revised MOBILE6-based MVEBs were developed for submittal as a SIP revision to the Philadelphia area attainment plan. Delaware's September 2, 2003 SIP submittal indicates that the overall emissions of VOC and/or NO<sub>x</sub> in the 1996 and 1999 periodic emissions inventories are below the rate-of-progress emission targets for those two milestone years, and concludes that the assumptions for growth and control strategies continue to be valid for the Delaware portion of the Philadelphia area. EPA finds that Delaware's

September 2, 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 standard by the attainment date of 2005 for the Delaware portion of the Philadelphia area.

#### *B. MOBILE6-Based Motor Vehicle Emission Budgets (MVEBs)*

As previously stated, the on-road components of VOC and NO<sub>x</sub> emissions of the 2005 attainment plan emission inventories are the 2005 MVEBs for the Philadelphia area. Those MVEBs for the Delaware portion of the Philadelphia area are summarized in Table 2. As indicated in Delaware's September 2, 2003 submittal, these budgets were developed using the latest planning assumptions, including 2002 vehicle registration, speed and vehicle miles traveled (VMT) data. Because Delaware's September 2, 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 standard, EPA is approving these MVEBs.

TABLE 2.—MOBILE6-BASED MOTOR VEHICLE EMISSION BUDGETS (MVEBs) FOR THE DELAWARE PORTION OF THE 1-HOUR ATTAINMENT DEMONSTRATION PLAN FOR THE PHILADELPHIA-WILMINGTON-TRENTON AREA

2005 Attainment year	Kent County		New Castle County	
	VOC	NO <sub>x</sub>	VOC	NO <sub>x</sub>
Emission Budgets (tpd) .....	5.14	8.42	15.08	21.28

<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>.

<sup>4</sup>Memorandum, "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>.