

Air Quality Conformity Report for **Amendment #14A** to the OKI FY 2018-2021 TIP –
Reliance on Previous Regional Emissions Analysis: **February 2019**

This report documents that the *OKI FY 2018-2021 Transportation Improvement Program (TIP)*, as amended, and the *OKI 2040 Regional Metropolitan Transportation Plan (OKI MTP)*, as amended on October 11, 2018, are in conformance with the State Implementation Plans (SIPs) of Indiana, Kentucky and Ohio and complies with the Clean Air Act. The amended TIP is relying on a previous regional emissions analysis per 40 CFR 93.122.

Under provisions of the Clean Air Act Amendments of 1990, the U.S. Environmental Protection Agency (EPA) designated nine counties in the Cincinnati area as a nonattainment area for ozone under the 2015 ozone standard. Nonattainment means that the area is not meeting the national ambient air quality standard. In April 2018, the U.S. Environmental Protection Agency (EPA) designated portions of nine counties in the Cincinnati area as a nonattainment area for ozone under the 2015 ozone standard. The 2015 Cincinnati ozone nonattainment area includes Lawrenceburg Township in Dearborn County Indiana, portions of the Kentucky counties of Boone, Campbell and Kenton, and the Ohio counties of Butler, Clermont, Clinton, Hamilton and Warren. Nonattainment and maintenance areas must demonstrate transportation conformity. Transportation conformity is a mechanism to ensure that federal funding and approval are given to those transportation activities that are consistent with air quality goals as contained in the State Implementation Plans (SIPs). OKI is responsible for the air quality conformity determination for the region's Transportation Plan and Transportation Improvement Program.

The amended TIP is a direct subset of the OKI Plan. The OKI Plan and TIP contain all projects which must be started in OKI's Plan and TIP's timeframes in order to achieve the highway and transit system envisioned by the OKI Plan. The previous regional emissions analysis was approved by OKI on October 11, 2018 to support the Amendment #4 of the OKI MTP and Amendment #11 of the OKI TIP. The federal conformity determination for the previous regional emissions analysis was made on November 29, 2018. All TIP and Plan projects, which are regionally significant, were included in the previous regional emissions analysis. The regional emissions analysis for the TIP and Plan included the design concept, timing and scope adequate to determine their contribution to regional emissions. Amendment #14A contains one non-exempt, regionally-significant project (PID# 104668). The amendment does not alter the design concept, or scope of that project but it does involve a minor delay of the project start date. This delay does not impact the regional emissions analysis since completion is expected before the next air quality analysis year of 2030. The results of the previous emission analysis are shown in the tables below. The emissions of ozone precursors, VOC and NO_x, do not exceed the established VOC or NO_x budgets.

Previous Regional Emissions Analysis of Ozone-forming Emissions (tons per day) for the Ohio¹ and Indiana Portion² of the Maintenance Area

	<u>2020</u>	<u>2030</u>	<u>2040</u>
Ohio/Indiana VOC Budget	30.00	18.22	18.22
Ohio/Indiana VOC Emissions	24.16	12.33	10.52
Ohio/Indiana NO _x Budget	30.79	16.22	16.22
Ohio/Indiana NO _x Emissions	24.11	7.50	10.04

¹Includes Clinton County

²Dearborn County emissions are for the maintenance portion only

Previous Regional Emissions Analysis of Ozone-forming Emissions (tons per day) for the Kentucky Portion of the Maintenance Area

	<u>2020</u>	<u>2030</u>	<u>2040</u>
N. Kentucky VOC Budget	4.11	2.82	2.82
N. Kentucky VOC Emissions	3.46	1.98	1.69
N. Kentucky NO _x Budget	7.39	4.37	4.37
N. Kentucky NO _x Emissions	5.94	2.58	2.00

OKI qualitatively finds that no goals, directives, recommendations or projects identified in the amended *OKI FY 2018-2021 TIP* contradict in a negative manner with any specific requirements or commitments of the applicable state implementation plans. The applicable implementation plans do not contain any transportation control measures (TCM's), therefore nothing in the amended TIP can interfere with their timely implementation. The *OKI FY 2018-2021 TIP*, as amended, and the *OKI 2040 Regional Transportation Plan* continue to meet all requirements regarding fiscal constraint. Details on the proposed actions and fiscal constraint can be found in the amendment document. In accordance with OKI's Public Participation Plan, the amendment documentation, as well as instructions on how to provide public comments, was posted on OKI's website for a period of at least 14 days prior to the adoption by the OKI Executive Committee on February 14, 2019. OKI initiated interagency consultation (IAC) on January 30, 2010. Any IAC correspondence and public comments related to the air quality conformity for this amendment will be shown below in the final report.