

Air Quality Conformity Report for **Amendment #10A** to the OKI FY 2026-2029 TIP –  
Reliance on Previous Regional Emissions Analysis: **September 2026**

This report documents that the [OKI FY 2026-2029 Transportation Improvement Program \(TIP\)](#), as amended, and the [OKI 2050 Regional Metropolitan Transportation Plan \(OKI MTP Update\)](#), as amended on October 9, 2025 are in conformance with the State Implementation Plans (SIPs) of Indiana, Kentucky and Ohio and complies with the Clean Air Act. The amended TIP, comprised of two Ohio non-exempt projects, is relying on a previous regional emissions analysis per 40 CFR 93.122.

The region continues to be classified as a maintenance area for the 2008 and 2015 Ozone National Ambient Air Quality Standard (NAAQS). The 2008 ozone area includes the counties of Butler, Clermont, Clinton, Hamilton, and Warren in Ohio; a portion of the counties of Boone, Campbell, and Kenton in Kentucky; and a portion of Dearborn County Indiana. The 2015 ozone area includes the Ohio counties of Butler, Clermont, Hamilton, and Warren; and a portion of the Kentucky counties of Boone, Campbell, and Kenton. Maintenance areas must continue to 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 *OKI FY 2026-2029 TIP* is a direct subset of the OKI 2050 MTP Update as amended. The OKI 2050 Plan and TIP contain all projects which must be started in OKI's MTP Update and TIP's timeframes to achieve the highway and transit system envisioned by the OKI 2050 Plan. OKI is relying on previous regional emissions analyses to support the amended TIP. The previous regional emissions analysis was developed to support the OKI 2050 MTP Update and amended OKI FY2024-2027 TIP, adopted on June 13, 2024 with U.S. DOT approval on July 19, 2024. The OKI FY2026-2029 TIP was adopted on April 10, 2025, with U.S. DOT approval on July 1, 2025. The demonstration of conformity is utilizing approved regional budgets for volatile organic compounds (VOC's) and oxides of nitrogen (NOx). VOC and NOx, along with oxygen, are the primary components of ozone. The 2015 ozone NAAQS budgets for the region are for the years 2026 and 2035. The 2008 ozone NAAQS budget for the region is for the year 2037.

Draft Amendment 10A includes six non-exempt projects in Kentucky which were included in the previous regional emissions analysis with no changes to timing or scope:

- PID 6-80150: Increases the construction phase funding for the KY 717 (Turfway Road) widening project in Boone County.
- PID 6-80207: Revises construction phase funding and moves it from FY 27/28 to FY29/30 for the Camp Ernst Road widening project in Boone County.
- PID 6-352.1 & 6-352.2: Splits the existing TIP project 6-352 into two phases in Campbell County. Funding is revised.

- PID 6-80203.1 & 6-80203.2: Splits the existing TIP project 6-80203 into two phases in Kenton County. Funding is revised.

The results from the previous emission analysis are shown in the table below. The emissions of ozone precursors, VOC and NO<sub>x</sub>, do not exceed the established VOC or NO<sub>x</sub> budgets of the region.

**Previous Regional Emission Analysis of Ozone-forming Emissions (tons per day) for the Kentucky Portion of the Maintenance Area - 2008 Ozone Standards (partial counties) - using the April 2018 approved MVEB's**

|                                                                                | <u>2026</u> | <u>2030</u> | <u>2040</u> | <u>2050</u> |
|--------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|
| N. Kentucky VOC Budget                                                         | 4.36        | 2.86        | 2.86        | 2.86        |
| N. Kentucky VOC Emissions                                                      | 2.93        | 2.45        | 1.83        | 1.63        |
|                                                                                |             |             |             |             |
| N. Kentucky NOx Budget                                                         | 9.03        | 5.19        | 5.19        | 5.19        |
| N. Kentucky NOx Emissions                                                      | 5.55        | 3.63        | 1.79        | 1.51        |
| <i>*Includes portions of Boone, Campbell, and Kenton Counties in Kentucky.</i> |             |             |             |             |

**Previous Regional Emissions Analysis - Quantitative Conformity Findings of Ozone-forming Emissions (tons per day) for the Kentucky Portion of the Maintenance Area – 2008 Ozone Standards (partial counties) - using the proposed MVEB's for the upcoming second 10-year maintenance plan**

|                           | <u>2037</u> | <u>2040</u> | <u>2050</u> |
|---------------------------|-------------|-------------|-------------|
| N. Kentucky VOC Budget    | 2.19        | 2.19        | 2.19        |
| N. Kentucky VOC Emissions | 1.90        | 1.83        | 1.63        |
|                           |             |             |             |
| N. Kentucky NOx Budget    | 2.29        | 2.29        | 2.29        |
| N. Kentucky NOx Emissions | 1.99        | 1.79        | 1.51        |

**Previous Regional Emissions Analysis - Quantitative Conformity Findings of Ozone-forming Emissions (tons per day) for the Kentucky Portion of the Maintenance Area – 2015 Ozone Standards (partial counties)**

|                                                                                | <u>2026</u> | <u>2035</u> | <u>2040</u> | <u>2050</u> |
|--------------------------------------------------------------------------------|-------------|-------------|-------------|-------------|
| N. Kentucky VOC Budget                                                         | 2.94        | 2.25        | 2.25        | 2.25        |
| N. Kentucky VOC Emissions                                                      | 2.93        | 2.07        | 1.83        | 1.63        |
|                                                                                |             |             |             |             |
| N. Kentucky NOx Budget                                                         | 6.92        | 4.84        | 4.84        | 4.84        |
| N. Kentucky NOx Emissions                                                      | 5.55        | 2.34        | 1.79        | 1.51        |
| <i>*Includes portions of Boone, Campbell, and Kenton Counties in Kentucky.</i> |             |             |             |             |

In addition to the above quantitative evaluation. OKI qualitatively finds that no goals, directives, recommendations, or projects identified in the amended *OKI FY 2026-2029 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 2026-2029 TIP*, as amended, and the *OKI 2050 Metropolitan Transportation Plan* continue to meet all requirements regarding fiscal constraint. Details on the proposed actions can be found in the amendment resolution. In accordance with OKI's Public Participation Plan, the amendment resolution, project tables, and this conformity 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 adoption by the OKI Executive Committee on August 26, 2026. OKI initiated interagency consultation (IAC) on August 27, 2026. Any IAC questions or comments will be provided in the final document.