

## **Appendix A**

## Ramirez, Ana

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**From:** Ramirez, Ana  
**Sent:** Wednesday, January 25, 2023 3:56 PM  
**To:** Ramirez, Ana  
**Subject:** FW: IAC Materials for MPOs with more than just 97 Ozone  
**Attachments:** Sample Conformity Summary Template.docx; Sample Email for IAC facilitation.docx

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**From:** ANTHONY.HILL@dot.ohio.gov <ANTHONY.HILL@dot.ohio.gov>

**Sent:** Monday, December 19, 2022 2:11 PM

**To:** emay@mpo.noaca.org; tking@eriecounty.oh.gov; rsharma@belomar.org; lagresta@clarkcountyohio.gov; ksympson@eastgatecog.org; tmazur@lacrpc.com; mhill@lcounty.com; ngill@morpc.org; Ramirez, Ana <ARamirez@mvrpc.org>; rkoehler@oki.org; jgdotson@starkcountyohio.gov; gedeon@tmacog.org; tracy.brown@movrc.org; Lance Dasher <dasher@tmacog.org>; Prater, Amy <APrater@akronohio.gov>; mikepap@bhjmpc.org

**Cc:** Jordan.Whisler@dot.ohio.gov; Nathaniel.Brugler@dot.ohio.gov

**Subject:** FW: IAC Materials for MPOs with more than just 97 Ozone

Hello Ohio Air Quality Interagency Consultation Partners,

As Metropolitan Planning Organizations (MPO) covering air quality regions either in maintenance and or nonattainment status for one or more of the National Ambient Air Quality Standards (NAAQS), a regional air quality conformity determination is required for your forthcoming 2024-2027 Transportation Improvement Program (TIP). In order to ensure all interested parties are in agreement to the perimeters through which a conformity determination will be made, over the next few months interagency consultation (IAC) will need to occur.

The requirements for IAC are outlined within the code of federal regulations under [40 CFR 93.105](#).

There is a need for concurrence on the following:

- Confirm AQ geographies
- Confirm Region's AQ NAAQS pollutants and status
- Confirm State Implementation Plan (SIP) status
- Determine need for new conformity analysis
- Determine appropriate conformity tests based on SIP status
- Establish conformity analysis years
- Establish approach for developing analysis year's network's emissions results
- Confirm use of latest emissions model
- Confirm status of any SIP mobile source TCMs

- Confirm use of latest planning assumptions
- Confirm public involvement (with conformity results) opportunity and schedule, based upon the MPO’s public involvement plan
- Establish schedule for submission of TIP and conformity documentation
- Confirm desired date for US DOT conformity determination

In an effort to efficiently facilitate IAC for all the effected regions within Ohio, the Ohio Department of Transportation (ODOT) proposes two distinct approaches:

1. For the seven Ohio MPOs located within US EPA designated 1997 Ozone Standard “Orphan” Areas, ODOT proposes taking the lead in coordination of IAC (similar to what was done for the 2021-2024 STIP). It will prepare a draft IAC analysis summary and facilitate IAC via email among all impacted parties. These seven MPOs include:

| MPO       | AQ Region            | 1997 8-Hr Ozone | 2008 8-Hr Ozone | 2015 8-Hr Ozone | 2006 PM2.5 24-Hr | 2012 PM 2.5 24-Hr |
|-----------|----------------------|-----------------|-----------------|-----------------|------------------|-------------------|
| Bel-O-Mar | Wheeling-Bridgeport  | Orphan Area     | -               | -               | -                | -                 |
| CCSTCC    | Dayton-Springfield   | Orphan Area     | -               | -               | -                | -                 |
| MVRPC     | Dayton-Springfield   | Orphan Area     | -               | -               | -                | -                 |
| Eastgate  | Youngstown-Warren    | Orphan Area     | -               | -               | -                | -                 |
| LACRPC    | Lima                 | Orphan Area     | -               | -               | -                | -                 |
| TMACOG    | Toledo               | Orphan Area     | -               | -               | -                | -                 |
| WWW       | Parkersburg-Marietta | Orphan Area     | -               | -               | -                | -                 |

2. For the eight Ohio MPOs located within areas designated as maintenance or nonattainment for standards other than just the 1997 Ozone NAAQS, ODOT proposes these agencies individually (per air quality region) take the lead in coordination of IAC utilizing the attached materials. These include a standard analysis summary template (see attached Sample Conformity Summary Template) containing all required components and a draft email to allow for email facilitation (see attached Sample Email for IAC facilitation). These eight MPOs include:

| MPO   | AQ Region       | 1997 8-Hr Ozone | 2008 8-Hr Ozone | 2015 8-Hr Ozone | 2006 PM2.5 24-Hr | 2012 PM 2.5 24-Hr |
|-------|-----------------|-----------------|-----------------|-----------------|------------------|-------------------|
| AMATS | Cleveland-Akron | -               | Maintenance     | Nonattainment   | Maintenance      | -                 |
| NOACA |                 | -               | Maintenance     | Nonattainment   | Maintenance      | Maintenance       |
| ERPC  |                 | -               | Maintenance     | Nonattainment   | Maintenance      | Maintenance       |

|       |                      |             |             |               |              |   |
|-------|----------------------|-------------|-------------|---------------|--------------|---|
| BHJ   | Steubenville-Weirton | Orphan Area | -           | -             | Maintenance* | - |
| LCATS | Columbus-Newark      | -           | Maintenance | Maintenance   | -            | - |
| MORPC |                      | -           | Maintenance | Maintenance   | -            | - |
| OKI   | Cincinnati-Hamilton  | -           | Maintenance | Nonattainment | -            | - |
| SCATS | Canton-Massillon     | Orphan Area | -           | -             | Maintenance  | - |

Please don't hesitate to send any questions or concerns you may have.

Thank you and have a good day,

**Anthony Hill**

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 ODOT Office of Statewide Planning & Research  
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## Ramirez, Ana

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**From:** ANTHONY.HILL@dot.ohio.gov  
**Sent:** Wednesday, January 25, 2023 3:18 PM  
**To:** gedeon@tmacog.org; tmazur@lacrpc.com; Ramirez, Ana; lagresta@clarkcountyohio.gov; tracy.brown@movrc.org; rsharma@belomar.org; ksympson@eastgatecog.org  
**Cc:** Jordan.Whisler@dot.ohio.gov  
**Subject:** 1997 Ozone Orphan Areas

Hello All,

I just wanted to contact you to pass on USDOT's comment resulting from the IAC process. From USDOT:

*This serves as confirmation that seven 1997 Ozone Standard MPOs can advance qualitative T-Plan/2024 - 2027 TIP conformity determinations.*

Please proceed as planned to utilize the 1997 Ozone Orphan Area Template to complete the TIP AQ qualitative analysis.

Once you have brought your MPO's TIP to your MPO board and a resolution has been passed, please send to me an email that contains the board resolution and the filled out 1997 Ozone Orphan Area Template. This email will serve as ODOT's notice that your MPO is ready for ODOT to proceed with making the formal TIP AQ Conformity determination request to USDOT.

As a side note, I know that many of the multi-state MPOs included on this email, are conducting their own IAC process and there is nothing wrong with doing so. I just wanted to make it known that ODOT will act as the lead agency for TIP AQ conformity. As instructed above, please send the requested materials to me so that ODOT can make the formal request to USDOT.

If there are any questions/concerns, please feel free to email or call me.

Have a good day,

**Anthony Hill**

Transportation Planner

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