



## Statement of the Ozone Transport Commission to the U.S. Environmental Protection Agency on the Motor Vehicle Emission Simulator (MOVES) Model

The members of the Ozone Transport Commission (OTC) are eager to work with the U.S. Environmental Protection Agency (EPA) to protect public health and the environment by achieving the National Ambient Air Quality Standards (NAAQS) as expeditiously as possible, as specified in the Clean Air Act. EPA has informed the states that they must use the new Motor Vehicle Emission Simulator (MOVES) model to estimate mobile source emissions for the particulate matter (PM) and Ozone state implementation plans (SIPs) now in development; however, the MOVES model and key portions of the modeling guidance are not yet available to the states. OTC urges EPA to get these critical tools to the states by no later than the end of 2009 so states can submit timely SIPs and measures can be implemented as early as possible to achieve healthful air.

The states are facing very demanding schedules in order to submit 8-hr Ozone and 24-hour PM SIPs that will result in timely emission reductions that meet our national air quality standards. The OTC members are aware of the significant work that the Office of Transportation and Air Quality (OTAQ) is undertaking to try to meet our schedule, and we know that EPA understands that it is critical that MOVES and its associated guidance and tools be available by no later than the end of 2009 in order for this to be possible. At a minimum, the states require that, in addition to a fully functioning MOVES model, EPA must complete the following elements and make them available to the states by no later than the end of this calendar year:

- Finalize the portion of the modeling guidance that details how states are to prepare the inputs needed for the MOVES model;
- Release final versions of software to convert MOBILE 6.2 inputs to MOVES input formats;
- Facilitate the early release of the MOVES model to the states, in advance of its issuance in the Federal Register and/or its posting on the EPA website, if necessary, so that there is no delay in getting this critical tool to them as soon as it is ready for use;
- Ensure that tools are available that facilitate using MOVES output in the SMOKE model; and
- Ensure that the appropriate vehicle classes are represented in MOVES for crediting continued emissions reductions resulting from Northeast states' early adoption of the NLEV program and from states' adoption of the California Low Emission Vehicle (CALEV) program.

In addition, the OTC states request that EPA complete the following elements by the second quarter of 2010:

- Ensure that MOVES is able to accurately calculate the emission reduction benefits from diesel emission reduction programs, e.g., retrofits and inspection and maintenance (I/M) programs;
- Ensure that MOVES is able to accurately calculate emission reduction benefits from vapor recovery programs and includes methods to

---

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

---

Anna Garcia  
Executive Director

---

444 N. Capitol St. NW  
Suite 638  
Washington, DC 20001  
(202) 508-3840  
FAX (202) 508-3841  
e-mail: ozone@otcair.org

---

appropriately account for Onboard Refueling Vapor Recovery (ORVR)-  
Stage II compatibility;

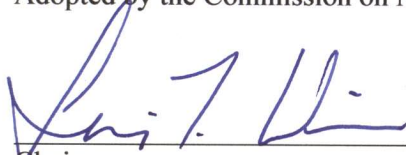
- Provide sufficient direction in the guidance and the necessary elements in the model to incorporate the crediting of emissions changes resulting from the use of alternative fuels; and
- Ensure that tools are available to efficiently prepare and facilitate the submittal of the National Emission Inventory (NEI) by the states.

The OTC states understand that MOVES is an improvement in comparison to MOBILE6 and would like to move quickly to utilize the new model. OTC very much appreciates the efforts that have been made by EPA's Office of Air and Radiation to facilitate our understanding of the model and address specific issues on the regular OTC-EPA SIP coordination calls we have been having since last June. In addition, the participation of OTAQ technical experts on regular technical workgroup calls hosted by the Mid-Atlantic Regional Air Management Association (MARAMA) focusing specifically on mobile source issues have greatly helped the OTC staff members in preparing to run MOVES and to obtain timely information about the model. OTC believes a continued high level of collaboration between the states, the regional planning organizations, and the EPA Regions and the Office of Air and Radiation will be necessary to enable us jointly to address critical issues on an ongoing, real-time basis.

The SIP process provides air quality benefits and protects the health of the public we serve. In order to submit and implement SIPs in a timely fashion, the OTC states must have adequate tools and guidance from our partners in the federal government. If EPA is not able to provide the tools that OTC has identified to be necessary by no later than the end of 2009 above, then EPA should allow the use of available alternative methods and tools for SIP and conformity purposes.

The OTC states look forward to continuing our collaboration with EPA on this issue, and we stand ready to work with you in protecting the health of our citizens and the environment.

Adopted by the Commission on November 5, 2009



---

Chair