



# Memo

To: Air Quality Interagency Working Group  
From: Philip Roth, Indianapolis MPO  
Date: January 15, 2008  
Re: Conformity under new State Implementation Plan

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The need for conformity analysis is triggered by amendments to any regional transportation plan or regional transportation improvement program involving additions, removal, or a change in time period for any regionally significant project. Amended transportation plans and programs for jurisdictions within or partially within nonattainment or maintenance areas must have a conformity finding from the U.S. Department of Transportation before they may be implemented.

In the October 19, 2007 Federal Register, the U.S. Environmental Protection Agency (EPA) redesignated the Central Indiana ozone nonattainment area (which includes the Counties of Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby) as a maintenance area. The EPA also established emissions budgets for Volatile Organic Compounds (VOC) and Nitrous Oxides (NOx) to be applied as a component of the Indiana State Implementation Plan (SIP). These budgets replace the interim “baseline test” methodology previously used for establishing conformity to the 8-hour ozone standard. The budgets establish typical Summer day emissions (in tons) for the analysis years of 2006 and 2020. For 2006, the VOC budget is 54.32 tons per day, and 106.19 tons per day for NOx. For 2020, the VOC budget is 29.52 tons per day, and 35.69 tons per day for NOx.

The most recent air quality analysis conducted for the Central Indiana nonattainment area was completed in January 2007, and approved by all three Central Indiana MPO’s (Anderson, Columbus, and Indianapolis). This documents includes 2006 and 2020 as analysis years, so in the absence of amendments to capacity projects, no new air quality analysis needs to be run. Results of the analysis are as follows:

Table 1: Emissions (tons per day)

	2006		2020	
	Actual	Budget	Actual	Budget
VOC	52.00	54.32	24.63	29.52
NOX	100.31	106.19	30.32	35.69

As can be seen, the modeled emissions are within the budgeted amounts for both pollutants, for both analysis years, indicating that a positive determination of conformity with the ozone pollutant can be made.