



TCM Substitution (Lessons Learned)

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Background – SAFETEA-LU & the CAA

- SAFETEA-LU amended Section 176 (c) of the CAA to allow for TCM substitutions without a full formal SIP revision
- The criteria that the replacement project must meet are listed in section 176 (c) and match those in SAFETEA-LU



TCM Substitution Process

- Document Prepared addressing 176(c) criteria
- Interagency consultation & public review
- Address comments
- Request for concurrence
- Concurrence CARB, EPA, MPO
- Request from District to CARB to revise CFR
- EPA publishes notice cleaning up CFR



TCM Substitution Criteria in 176(c)(8)(A)

- (i) Equivalent or greater emission reductions
- (ii) Implemented in a schedule that is consistent
- (iii) Adequate personnel, funding and authority
- (iv) (I) Collaborative process
- (iv) (II) Consultation with EPA
- (iv) (III) Public Notice and comment
- (v) MPO, State and EPA concurrence



Take Away Messages – TCM substitution

- Criteria for substitution are consistent with EPA's earlier guidance on TCM substitution mechanisms
- Consult with EPA, FHWA, CARB and district throughout the process
- CAA section 176 requires adoption by the MPO board and written concurrence from state and EPA
- Areas should plan on at least 6 months to complete process.