



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

BDE PROCEDURE MEMORANDUM

NUMBER: 23-03

SUBJECT: BDE Manual Revision – Chapter 26

DATE: July 28, 2023

Chapter 26 has been revised to reflect the latest prototype language from the Federal Highway Administration (FHWA) for National Environmental Policy Act (NEPA) documents and project reports pertaining to Mobile Source Air Toxics (MSAT) analysis. In addition, Chapter 26 has been updated to clarify requirements and updated text for project reports for Carbon Monoxide (CO) microscale analysis. Please see the BDE Manual on-line to view the revisions.

Background:

The Clean Air Act Amendments of 1990 (CAAA) provided the U.S. Environmental Protection Agency (U.S. EPA) with the authority to regulate 188 air toxics, also known as hazardous air pollutants. Of these 188 compounds, the U.S. EPA identified nine compounds with significant contributions from mobile sources that are among the national and regional-scale cancer risk drivers or contributors and non-cancer hazard contributors. These nine compounds are referred to as MSATs. As part of the NEPA review process, project sponsors are required to analyze the potential impact of proposed highway projects on MSAT emissions.

To assist project sponsors with MSAT analysis, the FHWA occasionally issues guidance. The guidance contains details on how an MSAT analysis should be carried out given the specific circumstances of individual projects, as well as appropriate language to insert in NEPA documents and other project reports. On January 18, 2023, the FHWA issued its most recent *Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents* memorandum. The *Interim Guidance* was issued in response to a new requirement for the use of a specific software package (MOVES3) for NEPA purposes. The prototype language to insert in NEPA documents and project reports has been updated to reflect analysis from MOVES3 as well as current trends in vehicle fleet emissions in the U.S.

For the Department, certain intersection projects are subject to a detailed analysis for carbon monoxide (CO) emissions. The Department and the Illinois Environmental Protection Agency (IEPA) have an agreement which stipulates the analysis requirements, including situations where projects are exempt from

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analysis. Project sponsors have raised questions and concerns regarding the requirements and the specific documentation needed for project reports.

Specifically, the following sections of the BDE Manual have been revised:

Section 26-13

Procedures for compliance with FHWA's MSAT requirements for Illinois are outlined in Section 26-13. These procedures have been updated to reflect the latest information from the FHWA *Interim Guidance* memorandum. The updates published in Section 26-13 primarily affect the prototype language for NEPA documents or project reports, which has been updated to be consistent with the FHWA *Interim Guidance* memorandum. Project sponsors are encouraged to contact the BDE Air Quality specialist if there are any project-specific questions related to MSAT analysis.

Section 26-14

The updates published in Section 26-14 provide additional clarity on analysis requirements and updated prototype language for NEPA documents or project reports. The analysis requirements have not changed. Project sponsors are encouraged to contact the BDE air quality specialist if there are any project-specific questions.



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