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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 28, 2018

Mr. Carl Young
Environmental Protection Agency Region 6 (GPD-S)
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: Docket No. EPA-R06-OAR-2017-0053; FRL-9978-46

Dear Mr. Young:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to comment on the United States Environmental Protection Agency's (EPA) proposed approval of the Attainment Demonstration (AD) for the Houston-Galveston-Brazoria (HGB) 2008 Ozone Nonattainment Area, as published in the *Federal Register* on May 29, 2018.

The TCEQ supports the EPA's proposed approval of the HGB AD state implementation plan (SIP) revision, including the AD analysis, the reasonably available control measures (RACM) analysis, the contingency measures plan, and the Motor Vehicle Emissions Budgets for 2017. The TCEQ also offers the following specific comments.

The TCEQ agrees with the EPA's analysis and proposed approval of the 2016 HGB AD SIP revision RACM analysis.

The TCEQ agrees that it conducted the 2016 HGB RACM analysis in accordance with Federal Clean Air Act, §172(c)(1) and relevant EPA-issued guidance resulting in the conclusion that no new control measures met the criteria to be RACM for the HGB area. As the EPA indicates in the proposed approval, implementing controls by the beginning of 2016 to "advance attainment by at least one year" to July 20, 2017 was not feasible. In addition, modeling and weight of evidence (WoE) included with the HGB AD SIP revision indicated that the HGB area would demonstrate attainment by the required attainment deadline.

The TCEQ agrees with the EPA's finding that all elements of the photochemical modeling are acceptable.

The TCEQ supports the thorough and thoughtful review of its modeling and related analyses demonstrating attainment of the 2008 ozone National Ambient Air Quality Standard (NAAQS) for the HGB area. The TCEQ appreciates that the EPA provided detailed comments on the photochemical modeling submitted by the TCEQ and found each element to be acceptable, including: model selection and configuration, episode selection, meteorological modeling, modeling inventory development, model

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performance, baseline and future-year selection, emission projection, and unmonitored area analysis.

The TCEQ supports EPA's holistic assessment of TCEQ's modeling and technical analysis in determining that the AD is approvable.

The TCEQ supports the EPA's assessment of TCEQ's modeling in conjunction with the WoE portions of the SIP to complete a holistic review of the AD. As noted in the EPA's proposed approval, 19 of the 20 HGB monitors had modeled 2017 future design values that were below the standard and only one monitor was above but very close to the standard.

The TCEQ appreciates the EPA highlighting the various components of the WoE analysis done by the TCEQ and how they are in line with Section 4.9: *Weight of Evidence* of the EPA's Draft December 2014 Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM2.5, and Regional Haze.

The TCEQ further appreciates and supports the supplemental analysis performed by the EPA, which considered 2014 through 2016 and preliminary 2017 monitoring data. Although 2016 and 2017 data were not available when the TCEQ adopted the SIP, the TCEQ agrees that the more recent monitoring data provide important insights into the current state of air quality in the area. As stated in the EPA's approval, with the exception of the high 2015 data, the recent monitoring data provides a strong positive WoE that supports the demonstration of attainment.

The TCEQ fully agrees with the EPA's conclusion that, "The combination of the modeling and the WoE indicate that recent emission levels are consistent with attainment of the standard and demonstrate attainment by the attainment date." (83 FR 24454)

If you have questions, please contact Mr. Steve Hagle, P.E., Deputy Director, Office of Air, at 512-239-1295 or steve.hagle@tceq.texas.gov.

Sincerely,



Stephanie Bergeron Perdue
Interim Executive Director
Texas Commission on Environmental Quality

cc: Guy Donaldson (Donaldson.guy@epa.gov)