

Houston-Galveston-Brazoria (HGB), Dallas-Fort Worth (DFW), and Bexar County State Implementation Plan (SIP) 2019 Emissions Inventory (EI) Revision Notice

Email Notice to the Air Quality [Point Source EI Listserve](#)

April 9, 2021

Email Subject: 2019 Emissions Inventory Revision Notice for Sites in 2008 and/or 2015 Eight-Hour Ozone National Ambient Air Quality Standards (Standard) Nonattainment Areas

This email is intended for sites that submitted a 2019 calendar year point source EI and are located in the:

- HGB 2008¹ and/or 2015² ozone nonattainment area(s),
- DFW 2008³ and/or 2015⁴ eight-hour ozone nonattainment area(s), or
- Bexar County 2015 eight-hour ozone nonattainment area.

What's changing?

The United States Environmental Protection Agency (EPA) may potentially reclassify DFW and HGB under the 2008⁵ and/or 2015 eight-hour ozone standards and reclassify Bexar County under the 2015 eight-hour ozone standard. Areas could be reclassified or “bumped up” to next classification level: from serious to severe for the 2008 eight-hour ozone standard and from marginal to moderate for the 2015 eight-hour ozone standard. Notice will be e-mailed via this system once the EPA proposes the reclassification(s).

In anticipation of these reclassifications, the Texas Commission on Environmental Quality (TCEQ) is preparing attainment demonstration (AD) SIP revisions for the DFW and HGB 2008 and 2015 eight-hour ozone nonattainment areas and the Bexar County 2015 eight-hour ozone nonattainment area.

TCEQ staff plans to use the following years for these potential AD SIP revisions which would change the SIP emissions year for credit generation projects.

Table 1. DFW 2008 and 2015 Eight-Hour Ozone Nonattainment Areas

| DFW Emissions Sources | Current SIP Emissions Year | New SIP Emissions Year |
|---------------------------------|----------------------------|------------------------|
| Electric generating units (EGU) | 2018 | 2019 |
| All other point sources | 2016 | 2019 |

Table 2. HGB 2008 and 2015 Eight-Hour Ozone Nonattainment Areas

| HGB Emissions Sources | Current SIP Emissions Year | New SIP Emissions Year |
|-------------------------|----------------------------|------------------------|
| EGUs | 2018 | 2019 |
| All other point sources | 2016 | 2019 |

¹ Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties

² Brazoria, Chambers, Fort Bend, Galveston, Harris, and, Montgomery Counties

³ Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise Counties

⁴ Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Tarrant, and Wise Counties

⁵ The HGB 2008 eight-hour ozone nonattainment area currently qualifies for a one-year extension to the attainment date per Federal Clean Air Act Section 181(a)(5). EPA's decision on the attainment date extension request is expected later this year.

Table 3. Bexar County 2015 Eight-Hour Ozone Nonattainment Area

| Bexar County Emissions Sources | Current SIP Emissions Year | New SIP Emissions Year |
|---------------------------------------|-----------------------------------|-------------------------------|
| All point sources | 2017 | 2019 |

How do these changes affect me?

If you are interested in generating credits, changes in the SIP emissions year may impact the total amount of credits you are eligible to generate.

Sources in nonattainment areas must have SIP emissions to be eligible to generate credits. For point sources in the HGB, DFW, and Bexar County areas, SIP emissions are or will be facility-specific values based on the state's annual EI data used for the most recent AD SIP modeling. Emissions data for the SIP emissions year must be updated by revising and submitting the appropriate EI per the instructions below to be considered for inclusion in the AD SIP modeling.

What if I want to update a site's point source emissions inventory data?

To ensure necessary changes are accounted for in the new AD SIP modeling, EI revisions to previously submitted 2019 EIs for point sources in the HGB and DFW 2008 and/or 2015 eight-hour ozone nonattainment areas and Bexar County 2015 eight-hour ozone nonattainment area must be postmarked by **July 9, 2021** and submitted to the TCEQ.

Please note: This is not an enforcement discretion opportunity to comply with EI reporting requirements. EIs not received by the original deadline are subject to enforcement and may not be processed or included in the upcoming AD SIP revisions at this time. Similarly, EIs for sites that do not meet the reporting requirements of 30 Texas Administrative Code Section 101.10 may not be processed at this time.

How do I update a site's point source emissions inventory data?

EI revisions must be prepared, certified, and submitted on EI forms with supporting documentation according to the [2020 Emissions Inventory Guidelines](#). The TCEQ will review revisions for adherence to this guidance. A detailed explanation of the changes, supporting documentation, and sample calculations must be included with the revised EI.

Information may be electronically submitted to psdocument@tceq.texas.gov; however, a hard copy of the EI certifying statements with wet-ink signatures must be submitted via mail.

USPS: Send correspondence via the United States Postal Service (overnight mail, etc.) to:
2019 HGB/DFW/Bexar Emissions Inventory Revisions, MC-166
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Overnight Service: Send correspondence via special overnight carrier (FedEx, etc.) to:
2019 HGB/DFW/Bexar Emissions Inventory Revisions, MC-166
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg. E, Third Floor
Austin, Texas 78753

What happens after EI revisions are submitted?

The TCEQ will review EI revisions that are submitted or postmarked by **July 9, 2021**. Upon concurrence with the revised information, the EI for the AD SIP will be adjusted. Once the AD SIP revision is adopted by the commission, emissions for credit generation will be based on the approved revision.

EI revisions received after **July 9, 2021** will be reviewed, but the SIP emissions for credit generation may not reflect the change.

For questions, contact Jill Dickey-Hull at jill.dickey@tceq.texas.gov.