1. Regulatory Structure

A. Federal Clean Air Act (FCAA) vs. Texas Health and Safety Code (THSC)

The Texas Commission on Environmental Quality (TCEQ) regulates air quality in the state of Texas through the Texas Clean Air Act (TCAA), located in Chapter 382 of the THSC; develops rules, including those in Title 30 Texas Administrative Code (TAC) Chapter 116; and implements provisions of the FCAA.

Title I of the FCAA requires states to develop State Implementation Plans (SIPs) to address attainment and maintenance of the National Ambient Air Quality Standards (NAAQS). Title I also requires a preconstruction permitting program for both major and minor sources (New Source Review or NSR).

B. The Code of Federal Regulations (CFR) and Texas Administrative Code (TAC) contain the federal and state regulatory bases of the federal programs.

C. Prevention of Significant Deterioration (PSD) vs. Nonattainment New Source Review (NNSR):

The PSD permitting program is applicable for criteria pollutants, in areas that are in compliance with the NAAQS for that pollutant. The PSD permitting program is also applicable for certain non-criteria pollutants. Non-criteria pollutants are pollutants that are regulated by the EPA; however, they do not have a NAAQS.

The NNSR permitting program is applicable for criteria pollutants in areas which are out of compliance with the NAAQS for that pollutant. If an area is out of compliance, or not in attainment with the NAAQS, it is generally referred to as a “nonattainment” area.

2. Concepts and Terminology

A. Terminology:

(1) Modifications [30 TAC §116.10(9)]
(2) Baseline actual emissions (BAE) [30 TAC §116.12(3) & 40 CFR §52.21(b)(48)]
(3) Allowable emissions [30 TAC §116.12(2)]
(4) Project increase (PI) [30 TAC §116.12(32)]
(5) Net Emission Increase (NEI) [30 TAC §116.12(22)]
(6) Major modifications [30 TAC §116.12(20) & 40 CFR §52.21(b)(2)(i)]

B. Concepts:

(1) National Ambient Air Quality Standards (NAAQS)
(2) Attainment status and classifications
(3) Major Source determinations:

(a) PSD:
   i. Named and Un-named sources
ii. “major for one (pollutant), major for all (pollutants)”

(b) Nonattainment: pollutant-specific
(4) Major Project: Major source by itself

3. **Attainment (or not) Relative to NAAQS**

A. Ambient concentration limits established in 1970 FCAA amendments.

B. Specified for designated “criteria pollutants” including:
   - Carbon monoxide (CO)
   - Nitrogen oxides (NO\textsubscript{x})
   - Sulfur dioxide (SO\textsubscript{2})
   - Ozone [as NO\textsubscript{x} or volatile organic compound (VOC)]
   - Particulate matter equal to or less than 10 microns in diameter (PM\textsubscript{10})
   - Particulate matter equal to or less than 2.5 microns in diameter (PM\textsubscript{2.5})
   - Lead (Pb)

   (PM has a modification threshold but does not have a standard.)

C. NO\textsubscript{x} and VOCs are regulated as precursors to ozone formation.

D. Primary NAAQS are levels of air quality, designated with an adequate margin of safety by the United States Environmental Protection Agency (EPA), to protect public health.

E. Secondary NAAQS are intended to protect public welfare from effects such as the deterioration of buildings and monuments from airborne contaminants.

F. The FCAA requires each state to establish state implementation plans (SIPs). The primary purpose of the SIPs is the administration of a program designed to attain or maintain compliance with the NAAQS. States are required to determine which areas are in compliance with the NAAQS (attainment areas) and which areas are not in compliance with the NAAQS (nonattainment areas).

G. Determination of NAAQS compliance is based, in part, on the information received from continuous ambient air monitoring stations. Areas found to be out of compliance with the NAAQS for a specific pollutant are designated as “nonattainment” for that pollutant.

H. Texas has 18 counties, which are nonattainment for ozone. Portions of El Paso County are nonattainment for PM\textsubscript{10}; and portions of portions of Freestone, Anderson, Rusk, Panola, and Titus Counties are nonattainment for SO\textsubscript{2}.

4. **Applicability Flowchart**
5. **PSD Applicability and Review**

A. PSD review is a New Source Review (NSR) permitting program applicable to new major sources, as well as to major modifications at existing major sources, of criteria pollutants and certain non-criteria pollutants. PSD review applies in all areas that are in compliance with the NAAQS for that particular pollutant.

B. For PSD review, if a source is major for any regulated pollutant under the FCAA, the source is major for all regulated pollutants and must therefore be evaluated for applicability of PSD to all potentially subject pollutants.

C. This evaluation is the comparison of the project increase of each regulated pollutant to the major modification threshold for that pollutant.

D. For PSD reviews, there are two separate potential to emit (PTE)-dependent definitions of “major source”:
   
   (1) Named major source – any source included under one of the 28 source categories listed under 40 CFR §52.21(b)(1)(i)(a) with a PTE greater than or equal to 100 tons/year (tpy) of any regulated pollutant.

   (2) Un-named major source – any source not listed under one of the 28 source categories with a PTE greater than or equal to 250 tpy of any regulated pollutant.

E. If the source is a named source, fugitive emissions are included in the total PTE to determine if the source is major. Named sources include the following 28 source categories [40 CFR 52.21 (b)(1)(iii)].

F. Fugitive emissions also need to be included in the determination of whether a source is major for any other source category, which as of August 7, 1980, is being regulated under Section 111 (New Source Performance Standards) or 112 (Hazardous Air Pollutants) of the Act.

G. PSD review can be applicable in one of two different ways:

   (1) For a project at a greenfield site or an existing “non-major” source, the project emission increase must by itself equal or exceed the major source definition (i.e., 100 tpy for a named source or 250 tpy for an un-named source). At greenfield sites, and for new facilities at existing non-major sources, the project
increase is indicated only by the project’s PTE. Project increases for modifications to existing non-major source facilities are determined as the difference between the modified facilities’ PTE and its baseline actual emissions.

(2) For a project at an existing “major” source, the project emissions increase must first equal or exceed the major modification significant emission rates* as shown in Table 1 for Criteria Pollutants and Table 2 for Non-Criteria Pollutants, and the contemporaneous net emissions increase must then also equal or exceed the same thresholds.

Table 1: Criteria Pollutants

<table>
<thead>
<tr>
<th>Criteria Pollutant</th>
<th>Emission Rate (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon monoxide</td>
<td>100</td>
</tr>
<tr>
<td>Nitrogen oxides</td>
<td>40</td>
</tr>
<tr>
<td>Sulfur dioxide</td>
<td>40</td>
</tr>
<tr>
<td>Ozone (as NOX or VOC)</td>
<td>40</td>
</tr>
<tr>
<td>Particulate matter (PM, PM_{10}, PM_{2.5})</td>
<td>25, 15, 10</td>
</tr>
<tr>
<td>Lead</td>
<td>0.6</td>
</tr>
</tbody>
</table>

Table 2: Non-Criteria Pollutants

<table>
<thead>
<tr>
<th>Non-Criteria Pollutant</th>
<th>Emission Rate (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fluorides</td>
<td>3</td>
</tr>
<tr>
<td>Sulfuric acid mist</td>
<td>7</td>
</tr>
<tr>
<td>Hydrogen sulfide</td>
<td>10</td>
</tr>
<tr>
<td>Total reduced sulfur (including hydrogen sulfide)</td>
<td>10</td>
</tr>
<tr>
<td>Total reduced sulfur compounds (including hydrogen sulfide)</td>
<td>10</td>
</tr>
<tr>
<td>Municipal waste combustor organics (measured as total tetra- through-octa chlorinated dibenzo-p-dioxins and dibenzofurans)</td>
<td>3.5 x 10^{-6}</td>
</tr>
<tr>
<td>Municipal waste combustor metals (measured as particulate matter)</td>
<td>15</td>
</tr>
<tr>
<td>Municipal waste combustor acid gases (measured as sulfur dioxide and hydrogen chloride)</td>
<td>40</td>
</tr>
</tbody>
</table>
**Other Significant Emissions:** Any emission rate of a pollutant subject to regulation under the Act that is not listed in Table 1 or Table 2 above. This includes ozone depleting substances regulated under Title VI, Chlorofluorocarbons (CFCs) 11, 12, 112, 114, 115, and Halons 1211, 1301, and 2402. Also includes any emission rate or net emissions increase associated with a major stationary source, or major modification, which would construct within ten kilometers (km) of a Class I area and have an impact on such area that is equal to or greater than one microgram per cubic meter on a 24-hour average.

H. Criteria pollutants are pollutants for which a NAAQS exists, and non-criteria pollutants are pollutants regulated by the EPA for which no NAAQS exists.

I. New major sources, and major modifications of existing major sources, must apply best available control technology (BACT), conduct an air quality analysis, and inform Federal Land Managers (FLMs)/other affected agencies of projects that occur within 100 kilometers (km) of a Class I area.

J. PM$_{10}$ and PM$_{2.5}$ emission rates include both front-half and back-half catch (filterable and condensable) emissions.

6. **PSD Applicability for Greenhouse Gas (GHG) Permitting**

A. Parts of Title 30 Texas Administrative Code (30 TAC) §116.164 were vacated by the U.S. Supreme Court, June 2014.

B. Title 30 TAC §116.164 (a)(1)-(2) remained intact, and amended to fix remaining disparities.

C. PSD BACT applies to GHG sources subject to PSD.

D. BACT requirements will appear in the permit conditions.

E. Applicability Categories and Thresholds –

   1. New “Anyway” Sources (new source which is major for non-GHG criteria pollutants):
      (a) GHG PTE $\geq$ 75,000 tpy CO$_2$e (carbon dioxide equivalents)
      (b) CO$_2$e = GHG PTE x GWP
      (c) See Global Warming Potential (GWP) list at 40 CFR 98, Subpart A Table 1.

   2. Existing “Anyway” Sources (existing source which is major for non-GHG criteria pollutants):
      (a) Proposed major modification for non-GHG criteria pollutants
      (b) GHG Project Increase > 0 tpy and $\geq$ 75,000 tpy CO$_2$e
      (c) Netting is allowed; however, if emissions cannot net out, and 2a. and 2b. apply, PSD review is required.

7. **Nonattainment Review Program**

A. Nonattainment review is a major NSR program for pollutants located in areas that are out of compliance, or not in attainment, with the NAAQS.

B. Nonattainment review applies to new major sources, and major modifications of existing major sources, in areas that are nonattainment for that particular pollutant.
The definition of major source and major modification for a nonattainment pollutant is dependent on the classification of the nonattainment area.

C. Nonattainment review in Texas applies primarily to ozone (which is regulated through ozone precursors – NOX and VOC); however, it is also possible to be subject to nonattainment review for PM10 in portions of El Paso County, and SO2 in portions of Freestone, Anderson, Rusk, Panola, and Titus Counties.

D. The most common nonattainment pollutant encountered is ozone, but also could apply to PM10 or SO2. Nonattainment review can be required in one of the following ways:

(1) For a project located at a greenfield site or existing minor source (for that pollutant), the project increase must be a major source by itself. The project emission increases must equal or exceed the major source significant emission rate, which is dependent on the classification of the particular nonattainment area where the project is proposed to be located.

(a) Dallas-Fort Worth (DFW) nonattainment area: Moderate nonattainment classification. Major source significant emission rate is greater than or equal to 100 tpy of either NOX or VOC. Comprised of the following counties: Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise.

(b) Houston-Galveston-Brazoria (HGB) nonattainment area: Moderate nonattainment classification. Major source significant emission rate is greater than or equal to 100 tpy of either NOX or VOC. Comprised of the following counties: Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller.

(c) Bexar County nonattainment area: Marginal nonattainment classification. Major source significant emission rate is greater than or equal to 100 tpy of either NOX or VOC.

(d) City of El Paso PM10 nonattainment area: Moderate nonattainment classification. Major source significant emission rate is greater than or equal to 100 tpy of PM10.

(e) SO2 nonattainment areas (portions of Titus, Panola, Rusk, Anderson, and Freestone Counties): Major source significant emission rate is greater than or equal to 100 tpy of SO2.

(2) For a project at an existing major source, the project emissions increase must equal or exceed the netting threshold. Additionally, if the net increase equals or exceeds the netting threshold, NNSR is applicable. The major modification significant emission rate also depends on the classification of the particular nonattainment area where the project is proposed to be located. For Marginal and Moderate Ozone nonattainment areas, the netting threshold is equal to the major modification threshold (40 tpy). For serious and severe ozone nonattainment areas, the netting threshold (5 tpy) is lower than the major modification threshold (25 tpy).

(a) DFW and HGB ozone nonattainment areas: Moderate nonattainment classification. Major modification threshold is 40 tpy of either NOX or VOC.
(b) Bexar County ozone nonattainment area: Marginal nonattainment classification. Major modification threshold is 40 tpy of either NO\textsubscript{X} or VOC.

(c) City of El Paso PM\textsubscript{10} nonattainment area: Marginal nonattainment classification. Major modification threshold is 40 tpy of PM\textsubscript{10}.

(d) SO\textsubscript{2} nonattainment areas (portions of Anderson, Freestone, Panola, Titus, and Rusk Counties): Major modification threshold of 40 tpy SO\textsubscript{2}.

E. For applicability of NNSR, a major source of a specific pollutant requires the evaluation only of that pollutant’s project increase against its major modification threshold in the area of interest. In ozone nonattainment areas, at sources that are major for NO\textsubscript{X} and VOC (precursors), the project increases of either NO\textsubscript{X} or VOC are evaluated individually (not cumulatively), but only the project increase of the pollutant(s) for which the source is major is evaluated against its major modification threshold. This restricted scope of evaluation for NNSR is different from the comparisons required for PSD review.

F. In the PSD case, if a source is major for any given pollutant, it is treated as a major source of each pollutant (major for one, major for all) for purposes of determining applicability. Accordingly, the project increases of each criteria pollutant, even if the source is a major source of only one pollutant, are quantified and compared to their respective major modification thresholds. PSD review applies to any pollutant for which this comparison indicates that both its project increase (PI) and net emissions increase (NEI) exceeds its respective major modification threshold. It is also possible to be subject to both NNSR and PSD review for NO\textsubscript{X} in ozone nonattainment areas (NNSR because the ozone NAAQS is regulated in terms of increases of VOC and NO\textsubscript{X} as ozone precursors and PSD review because NO\textsubscript{X} is still considered to be in attainment relative to the separate NAAQS specified for NO\textsubscript{2}).

G. When NNSR applies to new major sources and to major modifications of existing major sources, lowest achievable emission rate (LAER) control technology must be applied, and project emission increase offsets must be provided. Offsets are an actual emission reduction, supplied in an amount that is greater than or equal to the project’s emissions increase. The amount of offsets required depends on the nonattainment classification in the area where the project will be located. Offsets are administered by the Emissions Banking and Trading Team, in the TCEQ Air Quality Division. The classifications and offset ratios are shown in Table 3 of this outline.

<table>
<thead>
<tr>
<th>Classification</th>
<th>Offset Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone - Marginal</td>
<td>1.10:1</td>
</tr>
<tr>
<td>Ozone - Moderate</td>
<td>1.15:1</td>
</tr>
<tr>
<td>Ozone - Serious</td>
<td>1.20:1</td>
</tr>
<tr>
<td>Ozone - Severe</td>
<td>1.30:1</td>
</tr>
<tr>
<td>Ozone - Extreme</td>
<td>1.50:1</td>
</tr>
<tr>
<td>PM\textsubscript{10} - Moderate</td>
<td>1:1</td>
</tr>
<tr>
<td>SO\textsubscript{2} Nonattainment</td>
<td>1:1</td>
</tr>
</tbody>
</table>
8. **Determine the Emissions**

A. Netting is required if the project emission increase is greater than or equal to the netting threshold for the pollutant being evaluated.

B. Project emission increases are determined by taking the planned emission rates of the new, modified and affected sources and subtracting the baseline actual emission rates.

C. The planned emission rate (considering emission increases only) is either:
   
   (1) The PTE, or
   
   (2) A projected actual emission rate. The projected actual emission rate is the emission rate that an existing modified facility is expected, or projected, to emit. A “projected actual emission rate” should not be confused with either “baseline actual emission rate” or “actual emission rate.” Projected actual emission rates are outside of the scope of this presentation outline; however, the reader should be aware that it is another option that can be considered when discussing planned emission rates. For additional information related to projected actual emission rates, please see the “Federal New Source Review Guidance Document” on the TCEQ Web site, “General Guidance Documents for New Source Review Permitting”. Additionally, this topic will be covered in a separate presentation, “Advanced Prevention of Significant Deterioration (PSD)/Nonattainment (NA) Review/Netting”.

D. The baseline actual emission rate is the average emission rate (tpy) that was actually emitted during a consecutive 24-month period out of the previous ten years, or the previous five years for electric utilities.

   (1) For baseline actual emission rates, the same consecutive 24-month period for all facilities emitting a particular pollutant must be used for each project; however, a different 24-month period can be used for different pollutants.

   (2) For new equipment or equipment that has been in operation for less than two years, the baseline actual emission rate is zero.

E. If the project emissions (as determined above) are greater than or equal to the netting significance level for the pollutant being evaluated, then netting is required.

9. **Netting Definitions**

A. The baseline actual emission rate is the average emission rate (tpy) that was actually emitted during a consecutive 24-month period out of the previous ten years (five years for electric utilities) from either the date that construction started or the date the application was complete.

B. The planned emission rate, for purposes of the netting window, is the PTE. Though a projected actual may be used to determine project increases for the current project, projected actuals cannot be used when evaluating contemporaneous emissions.

C. The contemporaneous period (netting window) extends from:

   (1) Five years prior the proposed start of construction, to

   (2) The proposed start of operation
D. The netting significance levels are:
   (1) For PSD: the same as the PSD major modification significant emission rate.
   (2) For marginal and moderate ozone nonattainment areas: 40 tpy.
   (3) For serious and severe ozone nonattainment areas: 25 tpy.

   Note: Specific netting significance levels also apply to PM$_{10}$ and SO$_2$
   nonattainment areas.

10. **What is Netting?**

A. Netting is an applicability step that is used to determine if a change in emissions constitutes a significant modification and thus whether either PSD and/or nonattainment review has been triggered.

B. Netting applies to existing major sources only. Netting does not apply to new major sources or minor sources that may become major during the current project.

C. Netting is an evaluation of the current project undergoing review, plus all creditable emission increases and decreases within the contemporaneous period (also called the netting window) and is conducted to ensure that smaller projects do not add up to be a major modification.

D. For a project at an existing “major” source, if the net emissions increase is greater than or equal to the major modification significant emission rate for the pollutant (Table 1 for criteria pollutants, Table 2 for non-criteria pollutants), major NSR is triggered.

E. The “Net Emissions Increase” (NEI) in emissions is defined as the current project increases plus any non-project sitewide creditable contemporaneous emission increases minus any sitewide creditable contemporaneous emission decreases (including project).

F. An increase or decrease in emissions is “creditable” only if it:
   (1) occurs during the contemporaneous period,
(2) has not been relied on in issuing a federal new source review permit for the source,

(3) and the permit is in effect when the increase in emissions occurs.

G. Additionally, an increase in emissions is “creditable” if:

(1) it is the result of a modification or change in the method of operation of a stationary source only to the extent that the new level of emissions exceeds the baseline actual emission rate, and

(2) it does not include emission increases at facilities under a plant-wide applicability limit.

H. Additionally, a decrease in emissions is “creditable” to the extent that all of the following conditions are met:

(1) Baseline actual emission rate exceeds the new level of emissions.

(2) The decrease is enforceable at and after the time that actual construction on the particular change begins (must be enforceable and real before the unit starts operation). Therefore:

(a) The facility is authorized by a permit, and the allowable emission rate would be reduced to below the baseline emission rate (a Form APD-CERT or Form PI-7-CERT must be completed for the facility if it is authorized under standard permit or permit by rule);

(b) The executive director has not relied on it in issuing a PSD or nonattainment permit;

(c) The decrease has approximately the same qualitative significance for public health and welfare as that attributed to the increase from the particular change; and

(d) In the case of nonattainment applicability, the statute has not relied on the decrease to demonstrate attainment or reasonable further progress in the SIP.

(e) It was not used as an offset.

I. All creditable emissions should be identified on TCEQ Table 3F. Though not indicated on the form, processing the application may be expedited by providing the project number that authorized the modification. Creditable decreases should also be accompanied by TCEQ Table 4F.

J. Permit reviewers are reliant on the Emissions Inventory to verify creditable emissions. If creditable emissions cannot be verified, the values submitted in the inventory will be utilized unless information can be provided to verify the emissions claimed. Update of the inventory may be required.

K. During netting, changes are determined on a facility-by-facility and pollutant-by-pollutant basis for all facilities across the entire site (source) that have undergone a physical change or change in the method of operation (modification) during the contemporaneous period (netting window).

L. The netting window extends from five years prior to the projected start of construction through to the proposed start of operation. The permit holder must project planned future projects.
M. It is possible to trigger both PSD and nonattainment review for nitrogen oxides (NO\textsubscript{x}).

11. **Netting Methodology**

   A. Identify the contemporaneous period (netting window) for the project based on the definition.

   B. Identify all emission changes (new, modified, and affected facilities) at the site (source) on a project-by-project basis that have occurred, or that are projected to occur, within the defined contemporaneous period. Project emission changes within the contemporaneous period are identified based on either the date the modification was authorized or the date of the start of operation. The method used should be identified in the application. Both methods are acceptable. However, the method selected should continue to be used for any future permit actions.

   Emission changes within the contemporaneous period (outside of the project undergoing review) are determined on a pollutant-by-pollutant and project-by-project basis and are determined through a comparison of the baseline actual emission rate prior to the project and the PTE after the project. Although this approach treats a project differently when the project appears in a subsequent netting exercise, the approach is required by the EPA’s rule.

   C. All increases and decreases are calculated on a pollutant-by-pollutant basis for each project change in the window. Calculate the creditable increases and decreases for each project change identified in 11.B above. For project changes occurring in the “pre-project” portion of the window (five years prior), creditable increases and decreases must be determined based on the difference between the PTE for the project and the calculated baseline actual emission rate. As previously stated, projected actual emissions may only be used to determine creditable emissions in the current project. The PTE must be used to determine creditable increases and decreases for previous project changes within the netting window even though projected actual emissions may have been used when the project was authorized.

   In the example below, a modification to a unit (“prior project”) appears within the contemporaneous period for the current project. The baseline actual emissions for the prior project are the emissions, in tons/year, actually emitted during a consecutive 24-month period out of the previous ten-year period (five years for electric utilities). The baseline actual emission rate is compared to the PTE for the project to determine the creditable increase or decrease. For each project evaluated, the same consecutive 24-month period must be used for all subject facilities emitting a particular pollutant; however, a different 24-month period can be used for different pollutants.
D. For new equipment that was authorized in a project, the baseline actual emission rate is zero, and the increase is equal to the PTE. For equipment that had been in operation for less than two years, the project increase is determined by comparing the proposed PTE to the PTE that was authorized prior to the current modification (potential to potential). For example, the prior project increased the VOC PTE for a facility from 2 tons/year to 5 tons/year. At the time of the project, the facility had been in operation for less than two years. The project increase is determined by comparing the proposed PTE (5 tpy) to the PTE prior to the change (2 tpy). The creditable increase for the facility is 3 tons/year.

E. For each individual pollutant, sum the creditable increases and decreases for all project changes within the netting window. If the net emissions increase equals or exceeds the major modification significant emission rate for the pollutant, major new source review is triggered.

F. Creditable increases and decreases for each pollutant in which netting occurs should be submitted on TCEQ Table 3F.

G. Each creditable decrease should be accompanied by TCEQ Table 4F.

12. **Once Major NSR has been triggered**

A. For both PSD and NNSR permits:
   1. Review of RACT, BACT, LAER Clearinghouse (RBLC) database and TCEQ permits in control technology review.
   2. Additional notification requirements under 30 TAC Chapter 39
   3. Permit reviewer prepares Preliminary Determination Summary (PDS).

B. PSD:
   1. Must apply BACT.
   2. Additional modeling requirements – contact the TCEQ Air Dispersion Modeling Team (ADMT).
(3) For future projects, contemporaneous period is effectively limited to the start of operation of the last major modification for that pollutant at the site.

C. NNSR:
   (1) Must apply Lowest Achievable Emission Rate (LAER).
   (2) Provide alternative site analysis
   (3) Provide Tables 4N, 6N, and 9N.
   (4) Obtain offsets at a ratio dependent on the classification of the area.
   (5) Take out only the major project which was offset from the contemporaneous period for future projects.

13. Resource Summary

A. Recent PSD/NNSR permit actions

B. Reference guides and fact sheets:
   (1) Federal NSR Applicability
   (2) Preliminary Determination Summary
   (3) PSD/NNSR Fact Sheets

C. Contact Information –
   (1) Energy/Combustion Section:
      • Laura Gibson - (512) 239-2175 Laura.Gibson@tceq.texas.gov
      • Rick Goertz – (512) 239-5606 Richard.Goertz@tceq.texas.gov
      • David Reyna – (512) 239-6051 David.Reyna@tceq.texas.gov
   (2) Chemical Section:
      • Katherine Quinlan – (512) 239-1467 Katherine.Quinlan@tceq.texas.gov
      • Cheryl Covone – (512) 239-1248 Cheryl.Covone@tceq.texas.gov
      • Arturo J. Garza - (512) 239-5542 Javier.Garza@tceq.texas.gov