

Climate Pollution Reduction Grants (CPRG)
Planning Grants Workplan Outline for the Texas Commission on Environmental Quality (TCEQ)

WORKPLAN SUMMARY

Texas is highly committed to improving air quality and places a priority on reducing pollutants that have a direct health impact to Texans. As such, significant state resources have been and will continue to be directed toward compliance with the established National Ambient Air Quality Standard (NAAQS) as outlined under the Clean Air Act. While Texas remains focused on addressing compliance with health-based federal NAAQS, we acknowledge there are opportunities to implement strategies and measures that can result in a NAAQS and climate co-benefit.

TCEQ is to develop a Priority Action Plan (PAP) and a Comprehensive Action Plan (CAP) for strategies to reduce emissions from sources with a co-benefit in carbon emission reductions in the state of Texas, as well as a final status report on TCEQ's collaborations. TCEQ will meet with government, industry, and other potential stakeholders based on regional location. Expected cost for these deliverables is \$3,000,000 and will be conducted over a 48-month period beginning when grants are awarded, with an estimated timeframe of August 2023 through July 2027.

STRATEGIC LINKAGE

TCEQ Strategy 1.1.1: Air Quality Assessment and Planning

In response to EPA Goal 1, Objective 1.1, TCEQ will reduce and prevent air pollution by monitoring and assessing air quality, developing and revising plans to address identified air quality problems, and assisting in the implementation of approaches to reduce emissions.

RESPONSIBLE ENTITIES

Lead Organization:

TCEQ Office of Administrative Services, Federal Funds Section will serve as the lead contact for this grant.

Primary Contact	
Name:	Abhishek Nakarmi
Title:	Federal Grants Analyst
Department/Office:	Federal Funds Section, Office of Administrative Services
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Coordinating Entities:

No coordinating entities have been established at this time. Outreach during development of the PAP and CAP may result in identification of coordinating entities.

Competency Statement:

Environmental data operations conducted for this grant by TCEQ and its contractors are covered under documented quality management systems, in compliance with EPA QA/R-2 for Quality Management Plans (QMP) and EPA QA/R-5 for Quality Assurance Project Plans (QAPP). TCEQ QMPs have been approved annually since 1996. QAPPs and other QA documents (i.e., QAPP amendments/revisions, quality assurance plans, sampling and analysis plans, standard operating procedures, quality assurance memos, and summary reports) have been developed, implemented, and will be approved by EPA Region 6 when required.

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Competency requirements for TCEQ and contractor personnel are documented in the QMP, QAPPs, contracts, statements of work, and/or quality manuals as appropriate. Our field and laboratory personnel are deemed qualified to perform their work based on their educational credentials, specific job/task training, and demonstrations of competency, accreditation/certification, and internal and external assessments of their respective programs. All participating laboratories are part of the National Environmental Laboratory Accreditation Program or have received laboratory approval from TCEQ. Records of educational credentials, training, demonstrations of competency, accreditations/certifications, and assessments/corrective actions are retained by field and laboratory management and are available for review.

DELIVERABLES

The CPRG Planning Grant requires three key deliverables:

- PAP – due March 1, 2024
- CAP – due 2 years from award (Summer-Fall 2025)
- Status Report – due 4 years from award (Summer-Fall 2027)

Priority Action Plan (PAP):

The initial deliverable is a PAP, a narrative report submitted by March 1, 2024, that will focus on implementation-ready measures to reduce emissions from sources with a co-benefit in carbon emission reductions.

Using information gathered from existing emissions inventories, TCEQ will develop an inventory of potential emission sources that could be controlled with a co-benefit of carbon emission reductions in Texas. TCEQ will identify key sectors for future emission reductions, funding opportunities from local, state, and federal programs, and regulatory requirements resulting in emission reductions. The report will also include a regulatory analysis of local, state, and federal authorities to implement regulations and initiatives in support of this action plan.

The PAP will include:

- An examination of potential emission sources that could be controlled with a co-benefit of carbon emission reductions;
- Quantified reduction measures; and
- A review of authority to implement reduction measures.

The PAP will be developed beginning when funding is awarded and ending with submittal of the CAP as a deliverable as a quantitative output.

Report	Task	Activity	Timeline
PAP1	Gather Existing Emission Inventory Data	An inventory of sources of emissions will be developed utilizing the most current and updated emission inventory data available at the time of initiation of the task.	October 2023
PAP2	Identification of Priority Implementation Measures	Utilizing the emission inventory, implementation ready measures that could reduce pollution with a co-benefit of carbon emission reduction will be identified and quantified. Cost-effectiveness, economic factors, and existing funding opportunities will be included in the development of potential emission reduction measures that could be implemented.	January 2024

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Report	Task	Activity	Timeline
PAP3	High Level Regulatory Analysis	For each implementation measure, a regulatory analysis will be undertaken to be included in the PAP. This analysis will indicate the current existing statutory or regulatory authority to implement the pollution reduction measure or if such authority is not currently obtained.	February 2024
PAP4	PAP Report Submittal	The PAP will be submitted to EPA as a deliverable.	March 2024

Comprehensive Action Plan (CAP):

The CAP will update the information in the PAP to identify significant sources of emissions that could be controlled, quantify reduction measures that could be implemented within existing regulatory authority, estimated future emissions and reductions, analyze the benefits and disbenefits of identified reduction targets, and provide an updated examination of the authority to implement programs identified. Based on this information, potential sources of funding will be identified.

Programs to reduce pollution with a co-benefit of carbon emission reductions that were identified using CPRG planning grant funds will be implemented based on the analysis in the PAP and participation from stakeholders. Implementation grant funds could be used to supplement existing programs that reduce pollution, provide funding to implement new or existing programs, or create new programs.

The CAP will include:

- A comprehensive inventory of sources of pollutants that could be reduced with a co-benefit of carbon reductions and future emissions projections of emissions from those sources and sectors;
- Emission reduction targets for specific sectors including quantification of reductions and disbenefits, such as collateral increases;
- A benefits analysis for the full geographic scope and population covered by the proposed emission reductions;
- A review of authority to implement proposed reductions;
- A plan to leverage other available private, local, state, federal sources of funding; and
- A workforce planning analysis.

Report	Task	Activity	Timeline
CAP1	Targeted Stakeholder Meetings	Meeting with potential stakeholders to discuss the PAP developed for the CPRG planning grant and the implementation measures identified in that plan.	Quarterly
CAP2	Comprehensive Emission Inventory	An inventory of sources will be developed utilizing the most current and updated data available at the time of initiation of the task. The comprehensive emission inventory will build upon the preliminary emission inventories developed for the PAP and includes the sectors specified in the CPRG: industry, electricity generation and/or use, transportation, commercial and residential buildings, agriculture, natural and working lands, waste and materials management, and natural sources.	14 months after award of the CPRG Planning Grant
CAP3	Emission Projections	Near-term and long-term projections of emissions will be developed including projections with and without implementation of emission reduction measures identified in the PAP and development of the CAP.	14 months after award of the CPRG Planning Grant

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Report	Task	Activity	Timeline
CAP4	Comprehensive Implementation Measure Development	<p>Comprehensive emission inventory, emission projections, and stakeholder input will be used to identify and quantify measures that could reduce pollution with a co-benefit of carbon emission reduction. Cost-effectiveness, economic factors, and existing funding opportunities will be included for the potential emission reductions of criteria pollutants, air toxics, precursors, and carbon emissions that could be implemented. Reductions will be quantified to the extent possible using available data. Measures will be identified in each emission sector.</p> <p>Each identified measure will include an estimate of quantifiable emission reductions, collateral increases in emissions, key implementing agencies, implementation schedules and milestones, affected geographical areas, milestones for obtaining regulatory authority, identification of funding sources, and metrics for tracking progress. This task will include information from stakeholder engagement with local governments, state agencies, and federal partners.</p>	17 months after award of the CPRG Planning Grant
CAP5	Benefit Analysis	<p>Implementation measures identified will be quantitatively and qualitatively analyzed to determine benefits and disbenefits due to emission reductions and/or other disbenefits as a result of those actions, along with metrics to track implementation and verify benefits. An analysis of benefits anticipated to result from the implementation measures will be developed for inclusion in the CAP.</p>	23 months after award of the CPRG Planning Grant
CAP6	Funding Analysis	<p>Funding programs that could assist in the implementation of reduction measures that are available from federal, state, local and private sources that could be leveraged to pursue the objectives of the CAP will be determined to supplement CPRG implementation grant funds.</p> <p>This task will include information from stakeholder engagement with local governments, state agencies, and federal partners.</p>	23 months after award of the CPRG Planning Grant
CAP7	Regulatory Analysis	<p>For each implementation measure developed, a regulatory analysis will be undertaken to be included in the CAP. This analysis will indicate the current existing statutory or regulatory authority to implement the pollution reduction measure or if such authority is not currently obtained. If regulatory authority does not exist, milestones for obtaining authority to implement reduction measures will be included in the report.</p> <p>This task will require stakeholder engagement with local governments, state agencies, and federal partners.</p>	23 months after award of the CPRG Planning Grant
CAP8	Workforce Analysis	<p>Development of an analysis of anticipated workforce shortages that could prevent or delay implementation of reduction measures.</p>	23 months after award of the CPRG Planning Grant
CAP9	CAP Report Submittal	<p>The CAP will be submitted to EPA as a deliverable.</p>	24 months after award of the CPRG Planning Grant

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Status Report:

The final Status Report will include an update on the status of PAP and CAP implementation, including the status of implementation for the individual measures funded through CPRG implementation grants. Any measures still under development will be identified and responsible parties will be identified along with remaining actions required to complete implementation. An updated benefits analysis will be included, including reductions of pollution with a carbon reduction co-benefit that have been realized or will be realized by implementation of measures identified in the PAP and CAP, including any disbenefits. A final statutory and regulatory authority analysis will be developed for the report, along with an updated funding analysis and workforce development analysis.

This report will include:

- The implementation status of the quantified emissions reduction measures included in the CAP;
- Any relevant updated analyses or projections supporting CAP implementation; and,
- Next steps and future budget/staffing needs to continue CAP implementation.

Report	Task	Activity	Timeline
SR1	Status Report and Quantification of Implemented Reduction Measures	The status of measures identified as a result of the CAP and projects funded utilizing the CPRG Implementation Grant will be updated. For projects still under development, responsible parties and actions required to complete the implementations will be determined. For projects that have been fully implemented, the progress will be reported as determined during CAP development.	45 months after award of the CPRG Planning Grant
SR2	Benefit Analysis	Updated estimates of co-pollutant reductions, benefits, and disbenefits associated with implemented reduction measures from the CAP will be reported.	46 months after award of the CPRG Planning Grant
SR3	Funding Analysis	Updated sources of funding that did or could assist in the implementation of reduction measures that are available from federal, state, local and private sources will be provided as well as a summary of any CPRG implementation grant funds utilized to implement programs.	46 months after award of the CPRG Planning Grant
SR4	Regulatory Analysis	For each implementation measure, a final regulatory analysis will be undertaken and included in the Status Report. This analysis will indicate the current existing statutory or regulatory authority to implement the pollution reduction measure or if such authority is not currently obtained. This task will require stakeholder engagement with local governments, state agencies, and federal partners.	46 months after award of the CPRG Planning Grant
SR5	Workforce Planning Analysis	A final analysis of anticipated workforce issues that could prevent or delay implementation of reduction measures.	46 months after award of the CPRG Planning Grant
SR6	Future Budget and Staffing Needs	Next steps and future budget/staffing needs to continue CAP implementation following closeout of the CPRG planning grant. The Status Report should also provide a detailed budget that would be required to execute the next steps detailed in the plan.	46 months after award of the CPRG Planning Grant

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Report	Task	Activity	Timeline
SR7	Status Report Submittal	The Status Report will be submitted to EPA as a deliverable.	48 months after award of the CPRG Planning Grant

ENVIRONMENTAL RESULTS, OUTPUTS, AND OUTCOMES

Anticipated outputs from the CPRG planning grants include development of the PAP, CAP, Status Report, and progress reports.

The short-term and long-term environmental outcomes expected to be achieved under the CPRG planning and implementation grants and the process for tracking and measuring progress toward achieving those expected outputs and outcomes will be determined during the development of the PAP and CAP.

Performance measures will be tracked and implemented for CPRG tasks for deliverables associated with tasks outlined in the PAP and CAP alongside budget tracking and the status of any activities administered by sub-recipients, contractors, and vendors.

REPORTING

The following reports are required in addition to the three deliverables due under the CPRG planning cooperative agreements:

- Quarterly performance progress reports will include grant fund reporting elements and summaries of the project activity and status of outputs during the reporting period; and
- The final report will include a summary of activities completed during the grant project period, copies of all deliverables, a synopsis of outputs and outcomes achieved, and a financial summary of expenditures during the grant period.

BUDGET

Expenditure	Year 1	Year 2	Year 3	Year 4	Total
Personnel – GBC 1					
1 FTE Project Manager, B28	110,000	115,000	120,000	125,000	470,000
TOTAL PERSONNEL	110,000	115,000	120,000	125,000	470,000
Contracts – GBC 2					
Translation Services – Stakeholder Meetings	10,000	7,500	4,000	3,500	25,000
Modeling/Analytical services	200,000	350,000	104,389		654,389
Data Sources	200,000	200,000			400,000
TOTAL CONTRACTUAL	410,000	557,500	108,389	3,500	1,079,389
Travel – GBC 3					
CAP Stakeholder meetings	8,000	18,000	4,000	2,000	32,000
Pollution Control Conferences	2,000	2,000	2,000	2,000	8,000
Registration Fees for Training Events	1,000	1,000	1,000	1,000	4,000
TOTAL TRAVEL	11,000	21,000	7,000	5,000	44,000
Other – GBC 4					
Space Rental for Stakeholder Meetings	4,000	10,000	10,000	6,000	30,000
Printing and Publication Fees	4,000	8,000	-	5,000	17,000

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Expenditure	Year 1	Year 2	Year 3	Year 4	Total
1 Technical Specialist, B28	125,000	125,000	125,000	125,000	500,000
1 Technical Assistant, B24	70,000	70,000	70,000	70,000	280,000
1 Outreach Coordinator, B19	54,000	54,000	54,000	54,000	216,000
Postage	1,000	1,000	1,000	1,000	4,000
TOTAL OTHER	258,000	268,000	260,000	261,000	1,047,000
Supplies – GBC 5					
Office supplies - stakeholder meetings	5,000	5,000	5,000	5,000	20,000
Laptops (4) and associated accessories	10,000				10,000
TOTAL SUPPLIES	15,000	5,000	5,000	5,000	30,000
SUBTOTAL FUNDING	804,000	966,500	500,389	399,500	2,670,389
Fringe & Indirect Charges					
TCEQ FY23 Indirect Cost Rate = 33.30%	36,630	38,295	39,960	41,625	156,510
TCEQ FY23 Fringe Rate = 36.83%	40,513	42,355	44,196	46,038	173,101
TOTAL FRINGE & INDIRECT	77,143	80,650	84,156	87,663	329,611
TOTAL FUNDING	881,143	1,047,150	584,545	487,163	3,000,000
					3,000,000