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SIP Revision: Dallas-Ft. Worth (DFW) and Houston-Galveston-Brazoria (HGB) Moderate Area 2015 Eight-Hour Ozone Reasonable Further Progress (RFP), March 13, 2025

On March 13, 2025, the Texas Commission on Environmental Quality (TCEQ) adopted a RFP State Implementation Plan (SIP) revision for the DFW and HGB moderate nonattainment area under the 2015 Eight-Hour Ozone National Ambient Air Quality Standards (NAAQS).

Summary of the SIP Revision

Adoption Date: 03/13/2025

Proposal Date: 05/31/2023

EPA Approval Date: Pending

Background: The DFW 2015 ozone NAAQS nonattainment area, consisting of Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Tarrant, and Wise Counties, along with the HGB 2015 ozone NAAQS nonattainment area, consisting of Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties, were previously classified as marginal nonattainment for the 2015 eight-hour ozone NAAQS of 0.070 parts per million (ppm) with an August 3, 2021, attainment date. Based on 2020 monitoring data, neither area attained the standard. On October 7, 2022, the U.S. Environmental Protection Agency (EPA) published a final notice reclassifying the DFW and HGB areas from marginal to moderate, effective November 7, 2022 ([87 Federal Register \(FR\) 60897](#)).

On October 12, 2023, Texas Governor Greg Abbott signed and submitted a letter to EPA to voluntarily reclassify the Bexar County, DFW, and Houston-Galveston-Brazoria (HGB) 2015 eight-hour ozone NAAQS moderate nonattainment areas to serious.

On June 20, 2024, EPA published the final reclassification of the 2015 eight-hour ozone NAAQS nonattainment areas from moderate to serious, effective July 22, 2024 ([89 FR 51829](#)). The final reclassification action provided details on the moderate classification SIP elements that EPA deems to still be due despite the voluntary reclassification to serious.

The DFW and HGB nonattainment areas are still subject to the moderate nonattainment area RFP requirements in FCAA, §182(b)(1). The commission is currently litigating the issue of whether the remaining ozone nonattainment moderate elements are still required to be submitted to EPA. Since the litigation is not concluded, the commission has adopted and submitted to the EPA the DFW and HGB 2015 Ozone NAAQS Moderate Areas RFP SIP Revision to fulfill those obligations if a court finds those elements must be submitted by the state to avoid the imposition of federal sanctions. EPA's affirmative completeness determination was received April 30, 2025, for the DFW and HGB 2015 Ozone NAAQS Moderate Areas RFP SIP Revision, stopping the permitting sanctions and highway sanctions clock.



Key Changes: As a result of the voluntary reclassification of the DFW and HGB 2015 ozone NAAQS moderate nonattainment area to serious, this RFP SIP revision demonstrated that the DFW and HGB nonattainment areas achieved emissions reductions in ozone precursors (volatile organic compounds (VOC) and/or nitrogen oxides (NO_x)) consistent with the moderate ozone nonattainment area requirements of FCAA, §182(b)(1)(A) and EPA's Implementation of the 2015 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements; Final Rule (2015 eight-hour ozone standard SIP requirements rule) according to the following increments:

- a 15% emissions reduction for the six-year period from January 1, 2018, through December 31, 2023, for the nine-county DFW 2015 ozone NAAQS nonattainment area;
- a 3% emissions reduction for the one-year period between January 1, 2024, through December 31, 2024, as attainment year RFP contingency for the nine-county DFW 2015 ozone NAAQS nonattainment area;
- a 15% emissions reduction for the six-year period from January 1, 2018, through December 31, 2023 for the six-county HGB 2015 ozone NAAQS nonattainment area; and
- a 3% emissions reduction for the one-year period between January 1, 2024, through December 31, 2024, as attainment year RFP contingency for the six-county HGB 2015 ozone NAAQS nonattainment area.

In addition to demonstrating the required emissions reductions, this SIP revision also provided motor vehicle emissions budgets (MVEB) for the 2023 attainment year. This SIP revision demonstrated RFP for the DFW and HGB 2015 ozone NAAQS moderate nonattainment areas for the 2023 attainment year as well as the 2024 contingency year.

SIP Narrative and Appendices

Files linked from this page are in Portable Document Format ([PDF](#)).

Adopted DFW and HGB Moderate Areas RFP SIP Revision for the 2015 Eight-Hour Ozone NAAQS (Non-Rule Project No. 2022-023-SIP-NR)

- **Adopted DFW and HGB Moderate Areas RFP SIP Revision for the 2015 Eight-Hour Ozone NAAQS**
- Adopted Appendices
 - **Appendix 1: Dallas-Fort Worth (DFW) Reasonable Further Progress (RFP) Demonstration Spreadsheet**
 - **Appendix 2: Houston-Galveston-Brazoria (HGB) Reasonable Further Progress (RFP) Demonstration Spreadsheet**
 - **Appendix 3: Growth Factors for Area and Point Sources**
 - **Appendix 4: Characterization of Oil and Gas Production Equipment and Develop a Methodology to Estimate Statewide Emissions**
 - **Appendix 5: Industrial, Commercial, and Institutional (ICI) Fuel Use Study**
 - **Appendix 6: 2020 EPA Volatile Chemical Product (VCP) Nonpoint Emissions Methodology and Operator (NEMO) instructions (Draft Solvents NEMO)**
 - **Appendix 7: Development of the Nonroad Model RFP Emissions Inventories for the HGB Six-County, DFW Nine-County, and Bexar County Ozone Nonattainment Areas**



- **Appendix 8: 2014 Statewide Drilling Rig Emissions Inventory with Updated Trends Inventories**
- **Appendix 9: 2020 Texas CMV Emissions Inventory and 2011 through 2050 Trend Inventories**
- **Appendix 10: 2020 Texas Statewide Locomotive and Rail Yard Emissions Inventory and 2011 through 2050 Trend Inventories**
- **Appendix 11: 2020 Texas Statewide Airport Emissions Inventory and 2011 through 2050 Trend Inventories**
- **Appendix 12: Dallas-Fort Worth Motor Vehicle Emissions Simulator 3 (MOVES3)-Based Reasonable Further Progress On-road Inventories and Control Strategy Reductions for 2017, 2023, and 2024**
- **Appendix 13: Houston-Galveston-Brazoria (HGB) 2015-Eight-Hour Ozone Reasonable Further Progress On-Road Mobile Emissions Inventories**