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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 23, 2021

David Gray  
Acting Regional Administrator  
United States Environmental Protection Agency, Region 6  
1201 Elm Street, Suite 500  
Dallas, Texas 75270

Subject: 2008 Eight-Hour Ozone National Ambient Air Quality Standard (NAAQS) Milestone Compliance Demonstration for the 2020 Calendar Year

Dear Acting Administrator Gray:

Per the requirements in the Federal Clean Air Act, Section 182(g)(2), the Texas Commission on Environmental Quality is enclosing its milestone compliance demonstration for the Dallas-Fort Worth and Houston-Galveston-Brazoria areas, classified as serious nonattainment under the 2008 eight-hour ozone NAAQS.

Thank you for your consideration of this demonstration. If you have any questions, please contact Donna F. Huff, Deputy Director of the Air Quality Division, at 512-239-6628 or [donna.huff@tceq.texas.gov](mailto:donna.huff@tceq.texas.gov).

Sincerely,

A handwritten signature in cursive script that reads "Tonya Baer".

Tonya Baer  
Director  
Office of Air

Enclosure

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) 2008 EIGHT-HOUR  
OZONE NATIONAL AMBIENT AIR QUALITY STANDARD (NAAQS) MILESTONE  
COMPLIANCE DEMONSTRATION FOR THE 2020 CALENDAR YEAR**

**I. BACKGROUND**

For ozone nonattainment areas classified as serious, severe, or extreme, the Federal Clean Air Act (FCAA), §182(g)(2) requires that states submit a demonstration to the United State Environmental Protection Agency (EPA) that a reasonable further progress (RFP) milestone has been met, not later than 90 days after the applicable milestone date.

On August 23, 2019, the EPA reclassified both the eight-county<sup>1</sup> Houston-Galveston-Brazoria (HGB) area and the ten-county<sup>2</sup> Dallas-Fort Worth (DFW) area to serious nonattainment for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS) (84 *Federal Register* 44238).

On May 13, 2020, the TCEQ submitted a state implementation plan (SIP) revision to the EPA to fulfill RFP requirements for the HGB and DFW serious ozone nonattainment areas for the 2008 ozone NAAQS. This RFP SIP revision included a milestone year of 2020, the attainment year. Therefore, per FCAA §182(g)(2), the TCEQ must submit a milestone compliance demonstration for 2020 to the EPA no later than March 31, 2021.

**II. MILESTONE COMPLIANCE DEMONSTRATION**

TCEQ is required to demonstrate that ozone precursor (nitrogen oxides [NO<sub>x</sub>] and volatile organic compounds [VOC]) emissions will be reduced below the RFP emissions target values<sup>3</sup>. TCEQ demonstrates that the RFP requirement is met for each milestone year if the resulting controlled RFP emissions are less than the target level of emissions.

The RFP target level of ozone precursor emissions for the 2020 milestone year for the DFW and HGB serious ozone nonattainment areas is presented in Table 1: *DFW and HGB RFP 2020 Milestone Year Emissions Targets*.

**Table 1: DFW and HGB RFP 2020 Milestone Year Emissions Targets**

Area	NO <sub>x</sub> Emissions in Tons per Day	VOC Emissions in Tons per Day
DFW	334.10	450.79
HGB	371.17	493.33

The TCEQ has historically fulfilled milestone compliance demonstration requirements by submitting its periodic emissions inventories to the EPA and that submittal is the

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<sup>1</sup> Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties

<sup>2</sup> Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise Counties

<sup>3</sup> FCAA, Section 182 and the EPA's final 2008 eight-hour ozone NAAQS SIP requirements rule, 80 *Federal Register* 12263

best source for demonstrating compliance. The 2020 periodic emissions inventories are due to EPA in December 2021 and early 2022 per EPA rule and guidance.

For this demonstration, the TCEQ developed forecasted 2020 emissions based upon 2019 point source data, 2019 area source oil and gas data, and 2017 periodic emissions inventories for other area and mobile sources.

The forecasted 2020 emissions inventories are presented in Table 2: *2020 DFW Ten-County Nonattainment Area Ozone Precursor Emissions in Tons Per Day* and Table 3: *2020 HGB Eight-County Nonattainment Area Ozone Precursor Emissions in Tons Per Day*.

**Table 2: 2020 DFW Ten-County Nonattainment Area Ozone Precursor Emissions in Tons Per Day**

<b>Emissions Inventory Description</b>	<b>NO<sub>x</sub></b>	<b>VOC</b>
2020 DFW RFP targets (from Table 1)	334.10	450.79
2020 DFW forecasted emissions inventory (developed March 2021)	229.76	398.14
Difference between forecasted 2020 emissions inventory and RFP targets (tons)	-104.34	-52.65
Difference between forecasted 2020 emissions inventory and RFP targets (%)	-31%	-12%

**Table 3: 2020 HGB Eight-County Nonattainment Area Ozone Precursor Emissions in Tons Per Day**

<b>Emissions Inventory Description</b>	<b>NO<sub>x</sub></b>	<b>VOC</b>
2020 HGB RFP targets (from Table 1)	371.17	493.33
2020 HGB forecasted emissions inventory (developed March 2021)	286.34	454.48
Difference between forecasted 2020 emissions inventory and RFP targets (tons)	-84.83	-38.85
Difference between forecasted 2020 emissions inventory and RFP targets (%)	-23%	-8%

Compared to the RFP emissions targets in Table 1, the forecasted 2020 HGB and DFW NO<sub>x</sub> emissions in Tables 2 and 3 are approximately 23 to 31% lower and the forecasted 2020 HGB and DFW VOC emissions in Tables 2 and 3 are approximately 8 to 12% lower, indicating that both the DFW and HGB RFP 2020 emissions targets have been met.