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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 21, 2018

The Honorable Greg Abbott
Governor of Texas
State Capitol
P. O. Box 12428
Austin, TX 78711-2428

RE: Response to the December 22, 2017 Letter from the Environmental Protection Agency to Governor Abbott Regarding Intended Designations for the 2015 Ozone NAAQS

Dear Governor Abbott:

On December 22, 2017, Mr. Samuel Coleman, Acting Regional Administrator, sent a letter to you providing notification of the United States Environmental Protection Agency's (EPA) response to Texas' area recommendations and its approach for completing designations for the 2015 ozone National Ambient Air Quality Standards (NAAQS). The letter stated that Texas could submit additional information for EPA consideration by February 28, 2018. This letter is submitted in order to provide such additional information and to request that the EPA modify the intended designations for three counties.

After considering additional information, the Texas Commission on Environmental Quality (TCEQ) disagrees with the EPA's intended nonattainment designations for Rockwall County in the Dallas-Fort Worth (DFW) area and Liberty and Waller Counties in the Houston-Galveston-Brazoria (HGB) area. The State recommends that the EPA modify the designations for these three counties to attainment/unclassifiable for the reasons outlined below.

- **Rockwall County**
  Regulatory monitoring data indicate that Rockwall County is attaining the 2015 ozone NAAQS with a certified 2016 design value of 66 parts per billion (ppb). When back trajectories were generated for the 25 days each year that had the highest eight-hour ozone concentrations at the Rockwall County monitor in 2014, 2015, and 2016, the wind came from the south and southwest. Based on Rockwall County's location east of the DFW urban core, these wind directions do not indicate that on the days with the greatest eight-hour ozone concentrations the wind was traveling to the west and potentially impacting conditions in the DFW urban core.

  An assessment of the relevant factors used by EPA to evaluate appropriate boundaries for nonattainment areas indicates that Rockwall County does not significantly impact nonattainment in the DFW area. As of 2010, Rockwall County's population represented only 1.2% of the DFW-Arlington Metropolitan Statistical Area's (MSA) population. Less than 1% of the county's workforce commutes to DFW-area counties where monitors that exceed the ozone standard are located. Additionally, Rockwall County does not contribute significantly to either the nitrogen oxides (NO_X) or volatile organic compounds (VOC) emissions inventory for any source category in the DFW area. NO_X emissions constitute less than 1.1% of the DFW-area anthropogenic emissions inventory, and VOC emissions are less than 1.2% of the DFW-area anthropogenic emissions inventory.

Based on county location with respect to the DFW urban core, wind flow, ozone concentrations, population, commute patterns, and emissions inventory considerations, it is recommended that Rockwall County be designated attainment/unclassifiable.

- **Liberty County**
  Although a regulatory monitor is not located in Liberty County, data from a non-regulatory monitor in the county was used to calculate the 2016 eight-hour design value. Non-regulatory monitoring data indicate ozone levels in Liberty County are below the 2015 ozone NAAQS with a calculated 2016 design value of 68 ppb. When back trajectories were generated for the 25 days each year that had the highest eight-hour ozone concentrations at the non-regulatory monitor in 2014, 2015, and 2016, the wind generally came from the west, south, and east. Based on the ozone precursor emissions from Liberty County, even on occasions when the wind from the county travels through the HGB urban core, the impact could be considered insignificant.

  An assessment of the relevant factors used by EPA to evaluate appropriate boundaries for nonattainment areas indicates Liberty County does not significantly impact nonattainment in the HGB Area. As of 2010, Liberty County's population represented only 1.3% of the Houston-Sugar Land-Baytown MSA's population. Less than 1% of the county's workforce commutes to HGB-area counties where monitors that exceed the ozone standard are located. Additionally, Liberty County does not contribute significantly to either the NO_X or VOC emissions inventory for any source category in the HGB area. NO_X emissions constitute 2.3% of the HGB-area anthropogenic emissions inventory, and VOC emissions are 3.6% of the HGB-area anthropogenic emissions inventory.

  Based on county location with respect to the HGB urban core, wind flow, ozone concentrations, population, commute patterns, and emissions inventory considerations, it is recommended that Liberty County be designated attainment/unclassifiable.

- **Waller County**
  Monitoring data is not available because no monitors are located in Waller County. In the absence of an ozone monitor or preferential wind direction, there is no physical or scientific evidence to support the inclusion of Waller County in the HGB nonattainment area given the data listed below.

  An assessment of the relevant factors used by EPA to evaluate appropriate boundaries for nonattainment areas indicates Waller County does not significantly impact nonattainment in the HGB Area. As of 2010, Waller County's population represented only 0.7% of the Houston-Sugar Land-Baytown MSA's population. Less than 1% of the county's workforce commutes to HGB-area counties where monitors that exceed the ozone standard are located. Additionally, Waller County does not contribute significantly to either the NO_X or VOC emissions inventory for any source category. NO_X emissions constitute 1.3% of the HGB-area anthropogenic emissions inventory, and VOC emissions are 1% of the HGB-area anthropogenic emissions inventory.

  Based on the absence of an ozone monitor or preferential wind direction, along with considerations related to population, commute patterns, and emissions inventory, it is recommended that Waller County be designated attainment/unclassifiable.

The TCEQ agrees with the EPA's intended designations for all attainment/unclassifiable areas, including Hood and El Paso Counties. The intended attainment/unclassifiable designation for Hood County is consistent with the State's recommendation that the county be designated attainment based on 2014 through 2016 certified monitoring data. The intended attainment/unclassifiable designation for El Paso County is also consistent with the State's

recommendation that the county be designated attainment based on certified 2014 through 2016 monitoring data when considering exceptional events.

The TCEQ submitted an exceptional event demonstration on September 27, 2016 and three subsequent addendums for the El Paso UTEP (CAMS 12) monitoring site for a wildfire event that occurred on June 21, 2015, which results in a 2014 through 2016 design value for El Paso County that meets the 2015 ozone NAAQS. The EPA concurred with the demonstration in a December 15, 2017 letter from Acting Regional Administrator Sam Coleman and noted in the *El Paso, Texas and Doña Ana County, New Mexico Intended Area Designations for the 2015 Ozone National Ambient Air Quality Standards Technical Support Document (TSD)* that due to concurrence with the exceptional event determination, the UTEP monitor in El Paso County meets the 2015 ozone NAAQS for the 2014 through 2016 period.

The TCEQ appreciates the EPA's approval of the exceptional event demonstration and recognizes that concurrence was made under the revised 2016 Exceptional Events Rule. The TCEQ agrees that the demonstration meets the technical requirements of the revised rule. The TCEQ requests that all submittals be included in the docket for the *Air Quality Designations and Classifications for the 2015 Ozone Standards.* This includes the report by Dr. Jaffe submitted to the EPA on May 20, 2017 that supports the decision that wildfire emissions impacted the El Paso area on June 21, 2015.

Additionally, because El Paso and Hudspeth Counties are part of the El Paso-Las Cruces, Texas-New Mexico combined statistical area that also includes Doña Ana County, the TCEQ understands that the EPA performed an analysis regarding whether El Paso and Hudspeth Counties should be included as part of a multi-state nonattainment area based on contribution to the violating monitor in Doña Ana County. Texas agrees with the EPA's analysis and intention not to include El Paso or Hudspeth Counties in the Doña Ana County nonattainment area. This is consistent with prior EPA actions in this area relative to designations for the NAAQS.

If you have any questions or need additional information, please feel free to contact me at 512-239-5510.

Sincerely,

Bryan W. Shaw

Bryan W. Shaw, Ph.D., P.E., Chairman
Texas Commission on Environmental Quality

Enclosure

cc: Richard A. Hyde, P.E., Executive Director, TCEQ