



## **State Recommended Redesignation Substitute (RS) SIP Revision for the DFW One-Hour and 1997 Eight-Hour Ozone Standard Nonattainment Area**

### ***Background:***

In 1991, The DFW four-county nonattainment area, which included Collin, Dallas, Denton, and Tarrant Counties, was designated as moderate nonattainment for the one-hour ozone National Ambient Air Quality Standard (NAAQS) of 0.12 parts per million (ppm). In 1998, this area was reclassified as a serious nonattainment area due to failure to attain the one-hour ozone standard by the November 1996 deadline. The hour ozone standard was revoked in 2005 and in 2008, the EPA published the final determination that the DFW four-county area had attained the one-hour ozone NAAQS.

In 1997, the EPA revised the ozone NAAQS to 0.08 ppm, averaged over an eight-hour time period. In 2004, a nine-county DFW area, which included Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant Counties, was designated as moderate nonattainment for the 1997 eight-hour ozone NAAQS. Since attainment was not achieved by the attainment deadline of June 15, 2010, this nine-county DFW area reclassified to serious nonattainment. The deadline to attain the 1997 eight-hour ozone NAAQS was extended to June 13, 2013 and the area did not achieve attainment by this deadline. The EPA revoked the 1997 eight-hour ozone NAAQS as part of the implementation of the 2008 NAAQS for ozone.

Monitor data for the DFW four-county area continues to demonstrate attainment of the one-hour ozone NAAQS through 2015. In addition, the DFW nine county area monitored attainment of the eight-hour standard based on certified monitor data from 2012 through 2014. Since neither the four-county DFW area nor the nine-county DFW area achieved attainment prior to the revocation of the one-hour or the 1997 eight-hour ozone NAAQS, the anti-backsliding requirements and new source review (NSR) permitting requirements still apply. This means facilities must conduct nonattainment new source review (NNSR) per the requirements for a serious nonattainment area and the major source threshold for nitrogen oxide (NO<sub>x</sub>) and volatile organic compounds (VOCs) emissions for NNSR is 50 tons per year (tpy).

### ***Current Action:***

The 2008 ozone State Implementation Plan (SIP) requirements rule includes a mechanism, called a redesignation substitute, that allows for lifting the anti-backsliding obligations under a revoked NAAQS. Therefore, on April 27, 2016, TCEQ will consider adoption of the DFW Area Redesignation Substitute SIP Revision for the one-hour and 1997 eight-hour ozone NAAQS. This redesignation substitute SIP revision satisfies the anti-backsliding obligations for the revoked one-hour and the revoked 1997 eight-hour ozone NAAQS and ensures that the EPA's requirements for the redesignation of revoked ozone standards are met for the DFW four-county one-hour and nine-county 1997 eight-hour ozone nonattainment areas.

**If this redesignation substitute is approved by the EPA**, anti-backsliding obligations under the revoked one-hour and the revoked 1997 eight-hour ozone NAAQS would be lifted for the DFW four-county and nine-county areas, serious area NSR permitting thresholds would no longer apply, and the offset for permitting new emissions would be lowered. The nine-county area is currently classified as a moderate ozone nonattainment area for the 2008 eight-hour ozone NAAQS.

This would have huge implication for the NSR permitting requirements. The EPA has indicated that the DFW area that is designated nonattainment for the 2008 eight-hour ozone NAAQS must continue to implement the most stringent NSR requirement (whether under the one-hour standard, the 1997 eight-hour standard, or the 2008 eight-hour standard) to which the area is still subject. Since the DFW area is classified as serious for both the one-hour ozone and the 1997 eight-hour ozone standards, an approved redesignation substitute for both standards would be necessary to terminate existing serious-area NSR permitting requirements. The EPA will remove the provisions for nonattainment NSR for the revoked one-hour and 1997 eight-hour ozone NAAQS upon the EPA's approval of the one-hour and 1997 eight-hour ozone DFW redesignation substitute. The submittal of this redesignation substitute would include a request to remove these nonattainment NSR provisions for the DFW area upon approval by the EPA.

The comment period opened September 25, 2015 and closed October 30, 2015. No written comments were received during the comment period.

Additional information on TCEQ's Redesignation Substitute SIP Revision and reference documents are available at:

<https://www.tceq.texas.gov/airquality/sip/dfw/dfw-latest-ozone>

Trinity will provide updates to this SIP adoption via future eNews letters. To determine how these changes might affect your facility and future projects or compliance, call Trinity Consultants at (972) 661-8100 to speak with a permitting specialist.