

Agenda
Alamo Area Council of Governments
Air Quality Committee
Wednesday, February 22, 2023 - 9:00 a.m.
2700 NE Loop 410, Suite 101
San Antonio, TX 78217
Request All Electronic Devices Be Silenced

1. Meeting called to Order

The AACOG Air Quality Committee is meeting in accordance with Chapter 551 of the Texas Government Code (Open Meetings Act). As such, the Committee reserves the right to retire into executive session concerning any of the items listed on this Agenda whenever it is considered necessary and legally justified under the Texas Open Meetings Act.

2. Roll Call

3. Public Comments

This time is for anyone to comment to the Air Quality Committee on issues and items of concern. There will be no deliberation or action on these comments. Time allowed is at the discretion of the Chairman; with three (3) minutes being customary

Consent Agenda

The consent agenda consists of items considered being of a routine nature and contains items recommended for approval by the Air Quality Committee or the minutes from previous Committee meetings. These items will be enacted in one motion, or any member of the Committee may request that items be removed from the consent agenda and considered separately for purposes of discussion and voting.

- 4.** Consider and act upon the recommendation to approve the May 25, 2022 Air Quality Committee Meeting Minutes.

New Business

- 5.** Receive an update on current Natural Resources program activities. - Lyle Hufstetler
- 6.** Receive a briefing on the Environmental Protection Agency's (EPA) proposal to revise the National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM 2.5). - Lyle Hufstetler
- 7.** Consider and act upon the recommendation to forward comments in response to the EPA Administrator's proposed revision of the Particulate Matter (PM) National Ambient Air Quality Standards (NAAQS) to the AACOG Board for their approval. - Lyle Hufstetler
- 8.** Receive an update on the ozone season, including a recap of 2022 and what to expect for 2023. - Steven Smeltzer
- 9.** Receive an update on the potential consequences of ozone nonattainment. - Steven Smeltzer
- 10.** Next meeting is TBD.
- 11.** Adjournment

Items of interest for inclusion on future agendas should be forwarded to the Chair and Executive Director.



John Williams
Air Quality Committee Chair
Mayor, City of Universal City

This meeting is accessible to people with disabilities. The accessible entrance is located at the front entrance of 2700 NE Loop 410, San Antonio, TX 78217. Accessible parking spaces are also available. Please contact AACOG for auxiliary aids and services for the hearing impaired, including interpreters for the deaf, at 210-362-5200 at least 48 hours prior to the meeting or by calling Texas Relay at 7-1-1 for assistance.

Air Quality Committee

4.

Meeting Date: 02/22/2023

Title: May 25, 2022 Meeting Minutes

AGENDA ITEM DESCRIPTION:

Consider and act upon the recommendation to approve the May 25, 2022 Air Quality Committee Meeting Minutes.

BACKGROUND/HISTORY:

DISCUSSION:

FINANCIAL IMPACT:

STAFF RECOMMENDATION:

Attachments

May 25, 2022 Meeting Minutes

Minutes
Alamo Area Council of Governments
Air Quality Committee
Wednesday, May 25, 2022, 9:00 a.m.
2700 NE Loop 410, Suite 101
San Antonio, TX 78217

MEMBERS PRESENT

Mayor John Williams, Chair
 Marcus Primm for
 Commissioner Rebeca Clay Flores
 Judge Richard Evans
 Commissioner Mark Gillespie for
 Judge Robert Hurley
 Judge Richard Jackson
 Judge Sherman Krause
 Commissioner Jim Wolverton for
 Judge Kyle Kutcher
 Councilman Clayton Perry
 Judge Chris Schuchart

MEMBERS ABSENT

Judge Darrel Lux
 Brian Hoffman, JBSA Ex Officio, non-voting

GUESTS PRESENT

Bobby Aguilar, JBSA
 Ricardo Ambriz, SAMHD
 Kyle Cunningham, SAMHD
 Frank Dieck, SAMHD
 Danielle Frerich, CPS Energy
 Brent Larsen, JBSA AF
 Kenneth Ruiz, CPS Energy
 Steve San Miguel, JBSA
 Randolph

STAFF PRESENT

Diane Rath
 Rick Bluntzer
 Cliff Herberg
 Susie Ernst
 Lyle Hufstetler
 Miguel Seguara
 Steven Smeltzer

1. Chairman John Williams called the meeting to order at 9:00 a.m.

The AACOG Air Quality Committee is meeting in accordance with Chapter 551 of the Texas Government Code (Open Meetings Act). As such, the Committee reserves the right to retire into executive session concerning any of the items listed on this Agenda whenever it is considered necessary and legally justified under the Texas Open Meetings Act.

2. Roll Call was taken and a quorum was established.**3. No Public Comments were given.**

This time is for anyone to comment to the Air Quality Committee on issues and items of concern. There will be no deliberation or action on these comments. Time allowed is at the discretion of the Chairman; with three (3) minutes being customary.

Consent Agenda

The consent agenda consists of items considered being of a routine nature and contains items recommended for approval by the Air Quality Committee or the minutes from previous Committee meetings. These items will be enacted in one motion, or any member of the Committee may request that items be removed from the consent agenda and considered separately for purposes of discussion and voting.

4. Consider and act upon the recommendation to approve the January 26, 2022 Air Quality Committee Meeting Minutes.

Moved by Judge Richard Evans, seconded by Judge Chris Schuchart, to approve the January 26, 2022 Air Quality Committee meeting minutes as written. The motion carried unanimously.

Vote: 10 - 0

New Business

5. Consider and act upon the recommendation to bring before the AACOG Board of Directors a comment letter to EPA regarding its proposal to reclassify Bexar County to moderate nonattainment. - Lyle Hufstetler

Moved by Judge Chris Schuchart, seconded by Councilman Clayton Perry, to approve the recommendation to bring before the AACOG Board of Directors a comment letter to EPA regarding its proposal to reclassify Bexar County to moderate nonattainment with correction to signature title. The motion carried unanimously.

Vote: 10 - 0

6. Staff will provide an update on its air quality planning program areas, including TCEQ Rider 7, MPO, Clean Cities, DERA, and PACE. - Lyle Hufstetler

Update and presentation only, no action was needed nor taken.

7. Staff will provide an update on the 2022 Ozone Season and other NAAQS announcements. - Lyle Hufstetler

Update and presentation only, no action was needed nor taken.

8. Next meeting is TBD.

9. There being no further business to discuss, Chairman Williams adjourned the meeting at 9:35 a.m.

Items of interest for inclusion on future agendas should be forwarded to the Chair and Executive Director.



John Williams
Air Quality Committee Chair
Mayor, City of Universal City

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Air Quality Committee

5.

Meeting Date: 02/22/2023

Title: AACOG Natural Resources Program Updates

Presented by: Lyle Hufstetler, Natural Resources Project Coordinator

AGENDA ITEM DESCRIPTION:

Receive an update on current Natural Resources program activities. - Lyle Hufstetler

BACKGROUND/HISTORY:

AACOG's Natural Resources department addresses air quality issues in the region by bringing together stakeholders from all interests - government, industry, business, and residents - to implement air pollution reduction measures that benefit our quality of life.

DISCUSSION:

Department staff will discuss past and ongoing activities under its different programs:

- Alamo Area MPO
- TCEQ Rider 7 Air Quality Planning
- Clean Cities
- DERA
- SECO Energy Management Program

FINANCIAL IMPACT:

None

STAFF RECOMMENDATION:

For questions about air quality technical programs, please contact Steven Smeltzer at ssmeltzer@aacog.com or 210-362-5203. For outreach and education program questions, please contact Lyle Hufstetler@aacog.com or 210-376-9901.

Attachments

Natural Resources Program Updates



AACOG
Alamo Area Council
of Governments

Natural Resources Program Update

Presented by
Lyle Hufstetler | Natural Resources Project Administrator | AACOG
for
Air Quality Committee | February 22, 2023



PROGRAM UPDATES

Alamo Area MPO

TCEQ

Clean Cities & DERA

SECO Energy Management

Photochemical Modeling

- AACOG conducts ozone analysis using photochemical models that simulate actual high-ozone episodes
- The modeling episode currently being used for the San Antonio area is March 15 to October 31, 2019 (15 ramp up days)
- Houston, Dallas, and other areas in Texas are using the same episode to conduct photochemical modeling analysis
- The 2019 ozone season episode is approved by TCEQ for use in the Texas SIP



Model Runs and Next Steps

- 2019 Baseline and Base case runs
- 2023, 2026, and 2030 Projection Case Runs
- Anthropogenic Precursor Culpability Assessment (APCA) runs to trace ozone back to source regions and type
- Currently running future case scenarios





School Bus Inventory

- **Purpose:** Refine MOVES3 county-level school bus population, fuel type, age, VMT inputs in consultation with TTI
- 18 responses received, 2 pending
- Preparing second round of data requests, enticing with Ozone Action Day banners
- Refine mobile emissions model inputs and facilitate Clean Cities outreach





Smoking Vehicle Reporting Program

- **Purpose:** Reporting system to notify operators of vehicles illegally emitting visible smoke for more than 10 seconds, provide them with resources for repair/replacement
- Working with NCTCOG to replicate their online reporting system
- Ready to launch phone reporting system upon TxDMV contract execution





TCEQ Rider 7 Activities

Activities may only occur in Comal, Guadalupe, and Wilson Counties

● Ambient Air Quality Monitoring

- Three NOX monitors: Bulverde C503, New Braunfels Airport C504, Garden Ridge C505
- One active Auto-GC for VOCs at Garden Ridge C505 running continuously
- Reduction in funding from 2020-2021 leaves two NOX and one SO2 monitor unused

● Truck Idling Emission Inventory

- Updating the 2018 inventory, handful of new locations
- Data collected: Number of spaces, number of trucks idling, temperature, amenities
- Bulk of surveys to be conducted during 2023 ozone season peaks



Clean Cities Activities

- Outreach & Demonstration Events
 - Seguin Earth Day EV demo April 30
 - Medium- and heavy-duty EV showcase September 29 & 30
 - SA Drive Electric October 1 – grid room presentation
- Incentives & Compliance Coordination Activities
 - Inflation Reduction Act webinar December 1
- Corridor & Infrastructure Development
 - Assist TxDOT with development of state NEVI plan
 - Review stakeholder applications for grants to deploy EV infrastructure
 - Secure replacement subrecipient for DERA funding



Regional Energy Management Program

The Texas State Energy Conservation Office (SECO) has awarded AACOG with \$175,000 to launch a regional energy management program for local governments.

- Survey to identify future activities (interests, needs, priorities, capacity)
- Train and educate through workshops, peer exchange
- Create web page for workshops, digital references
- Benchmark and report regional energy per TSHC §388.005(c)
- White papers/case studies – one for LG recommendations & one related topic
- Program expansion & roundtable discussions
 - PACE, resilience (hazard mitigation planning), energy code adoption



Steven Smeltzer

Environmental Manager, AACOG

Lyle Hufstetler

Natural Resources Project Administrator, AACOG

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San Antonio, Texas 78217





2019 vs Other Years

| Days > 70 ppb | CAMS 23 | CAMS 58 | CAMS 59 |
|---------------|---------|---------|---------|
| 2010 | 4 | 9 | 2 |
| 2011 | 15 | 12 | 7 |
| 2012 | 13 | 13 | 3 |
| 2013 | 11 | 16 | 1 |
| 2014 | 1 | 4 | 1 |
| 2015 | 11 | 12 | 1 |
| 2016 | 4 | 2 | 1 |
| 2017 | 4 | 5 | 0 |
| 2018 | 5 | 7 | 4 |
| 2019 | 4 | 1 | 0 |
| 2020 | 2 | 7 | 1 |
| 2021 | 2 | 12 | 0 |
| 2022 | 6 | 9 | 2 |

| Days > 60 ppb | CAMS 23 | CAMS 58 | CAMS 59 |
|---------------|---------|---------|---------|
| 2010 | 16 | 26 | 12 |
| 2011 | 42 | 38 | 31 |
| 2012 | 40 | 40 | 16 |
| 2013 | 26 | 42 | 15 |
| 2014 | 18 | 36 | 12 |
| 2015 | 32 | 31 | 15 |
| 2016 | 11 | 11 | 6 |
| 2017 | 13 | 19 | 12 |
| 2018 | 18 | 23 | 17 |
| 2019 | 10 | 10 | 5 |
| 2020 | 19 | 33 | 12 |
| 2021 | 21 | 30 | 13 |
| 2022 | 27 | 33 | 20 |



High Ozone Days, 2019

| Monitor Site | Number of Days over 60 ppb | Number of Days over 70 ppb |
|----------------------------------|----------------------------|----------------------------|
| San Antonio Northwest CAMS 23 | 10 | 4 |
| Camp Bullis CAMS 58 | 9 | 1 |
| Calaveras Lake CAMS 59 | 4 | 0 |



Modeling Episode Selection Criteria

EPA Modeling Guidance recommends choosing a time period that:

- Has a sufficient number of exceedance days;
- Follows historically observed patterns;
- Includes a variety of meteorological conditions that frequently correspond to high ozone;
- Has at least five days in the episode for each exceeding regulatory monitor maximum daily average eight-hour value greater than or equal to 60 ppb; and
- Is in the recent past

Modeling Domain Map (2019 Episode)



Photochemical Modeling Setup

- Emission processing: Emissions Processor Version 3 (EPS3)
- Meteorological modeling: Weather Research and Forecast model (WRF) v. 4.1.5
- Air quality modeling: Comprehensive Air-quality Model with Extension (CAMx) version 7.20 (TCEQ is using CAMx 7.10)



APCA

- The EPA and TCEQ-approved Anthropogenic Precursor Culpability Assessment (APCA) was used to trace ozone back to source regions.
- APCA uses the photochemical grid model to estimate the contributions from multiple source areas, categories, and pollutants.
- APCA uses multiple tracer species to track the fate of ozone precursor emissions (VOC and NO_x) and the ozone formation caused by these emissions
- This information indicates how ozone concentrations will respond to reductions in VOC and NO_x precursor emissions

Air Quality Committee

6.

Meeting Date: 02/22/2023

Title: EPA Proposed Revision of the NAAQS for Fine Particulate Matter

Presented by: Lyle Hufstetler, Natural Resources Project Coordinator

AGENDA ITEM DESCRIPTION:

Receive a briefing on the Environmental Protection Agency's (EPA) proposal to revise the National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM_{2.5}). - Lyle Hufstetler

BACKGROUND/HISTORY:

The Clean Air Act gives EPA authority to protect human health by setting and enforcing National Ambient Air Quality Standards (NAAQS) for "criteria pollutants". These NAAQS must be periodically reviewed for consistency with the latest science. On January 6, the EPA announced its intent to lower the primary annual National Ambient Air Quality Standard (NAAQS) for fine particulate matter.

DISCUSSION:

The EPA is proposing to revise the level of the primary (health-based) annual standard for fine particles (PM_{2.5}) from its current level of 12.0 µg/m³ to within the range of 9.0 – 10.0 µg/m³. The EPA is proposing to retain all other PM standards. This proposal also revises the air quality index to improve public communications about the risk of PM_{2.5} exposure. They are also proposing changes to the PM monitoring network requirements to require monitoring in at-risk communities where there are anticipated effects from sources in the area contributing to poor air quality.

There are nine PM monitors in the AACOG region, with 7 in Bexar County, one in Atascosa County, and one in Comal County. Four of these monitors are regulatory, which means they can be used to make attainment determinations. Of the regulatory monitors with a complete three-year dataset, none are in danger of being declared nonattainment, even at the lower end of the proposed range. A regulatory monitor in Atascosa County may be at risk of nonattainment, depending on 2023 data.

FINANCIAL IMPACT:

None

STAFF RECOMMENDATION:

For informational purposes only. Please contact Lyle Hufstetler at lhufstetler@aacog.com or 210-376-9901 if you have any questions.

Attachments

Proposed Particulate Matter NAAQS Revision



AACOG
Alamo Area Council
of Governments

Particulate Matter NAAQS Reconsideration

Presented by
Lyle Hufstetler | Natural Resources Project Administrator | AACOG
for
Air Quality Committee | February 22, 2023



AGENDA

What is Particulate Matter?

PM NAAQS Revision

Our PM Status

SIP Requirements

What is Particulate Matter?

- **Mixture of solid and liquid droplets**

- Primary particles emitted directly from a source (smokestacks, fires, construction sites, etc.)
- Secondary particles produced through complex chemical reactions (e.g., NO_2 , SO_2)

- **Particles defined by aerodynamic diameter**

- Coarse particles (PM_{10}) $\leq 10 \mu\text{m}$
- Fine particles ($\text{PM}_{2.5}$) $\leq 2.5 \mu\text{m}$
- Ultrafine particles (UFPs) $\leq 0.1 \mu\text{m}$

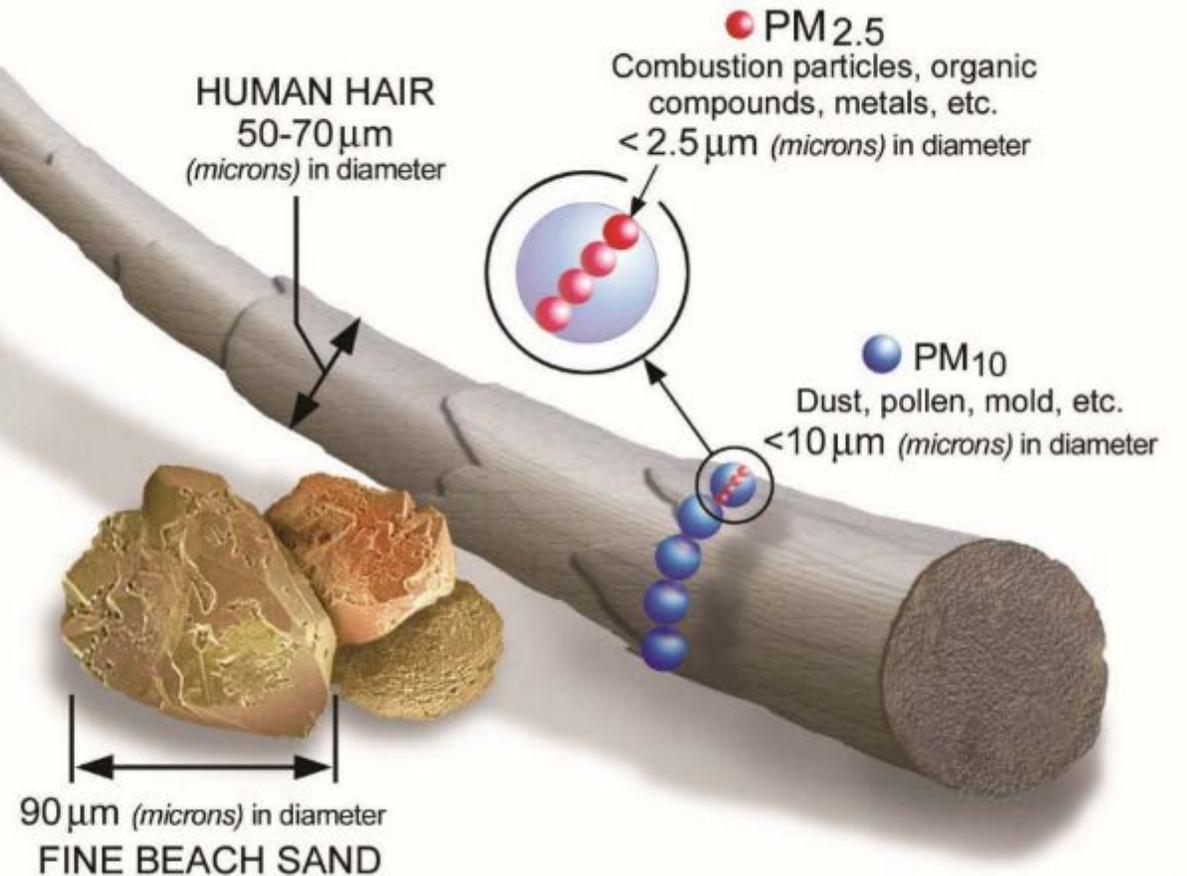
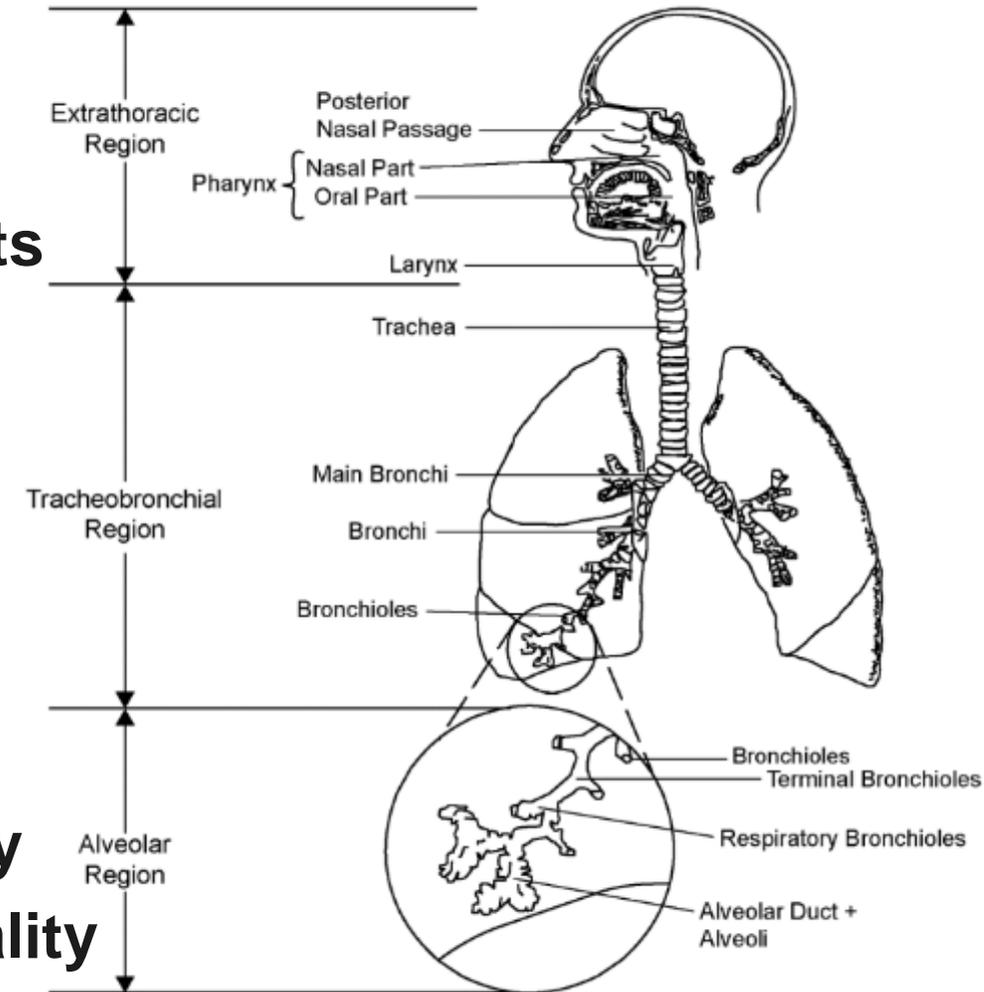


Image courtesy of the U.S. EPA

Harmful Effects of Particulate Matter

- Fine particles ($PM_{2.5}$) are of greatest health concern
- $PM_{2.5}$ can enter the respiratory tract and make its way into the lower parts of the lungs
- Some particles can move out of the respiratory system and affect other organ systems
- Exposure to $PM_{2.5}$ can both exacerbate pre-existing health conditions and lead to the development of some diseases (e.g., respiratory and cardiovascular) as well as premature mortality





Regulatory Framework

- **Federal Clean Air Act gives EPA authority to protect human health by setting and enforcing National Ambient Air Quality Standards (NAAQS) for “criteria pollutants”**
- **Must be periodically reviewed (target 5 year cycle) for consistency with latest science**
- **Primary standards protect public health; secondary standards protect public welfare (visibility, buildings, flora & fauna)**
- **Economic cost cannot be considered when setting NAAQS**
- **Failure to meet NAAQS results in nonattainment designation; State Implementation Plans (SIP) must be developed**

Main Elements of the Proposal

- **EPA is proposing to revise the level of the primary (health-based) annual standard for fine particles (PM_{2.5}) from its current level of 12.0 µg/m³ to within the range of 9.0 – 10.0 µg/m³**
- **EPA is proposing to retain all other PM standards:**
- **EPA is also proposing to:**
 - Revise the Air Quality Index (AQI) to improve public communications about the risks from PM_{2.5} exposures
 - Make changes to the monitoring network to enhance protection of air quality in communities overburdened by air pollution

Proposed PM Monitoring Revisions

- EPA proposes modifying the PM_{2.5} network design criteria to require monitoring in at-risk communities where there are anticipated effects from sources in the area contributing to poor air quality
 - As written the network design proposed change does not add a requirement for new monitors, rather it utilizes existing sites and ensures at risk communities are considered if sites need to move
- **Note: any new or moved monitors as a result of the modification in the PM NAAQS rule revision (if finalized) would not be in effect for the upcoming PM_{2.5} designations cycle**
- EPA is also proposing revisions to breakpoints on the Air Quality Index for PM_{2.5}



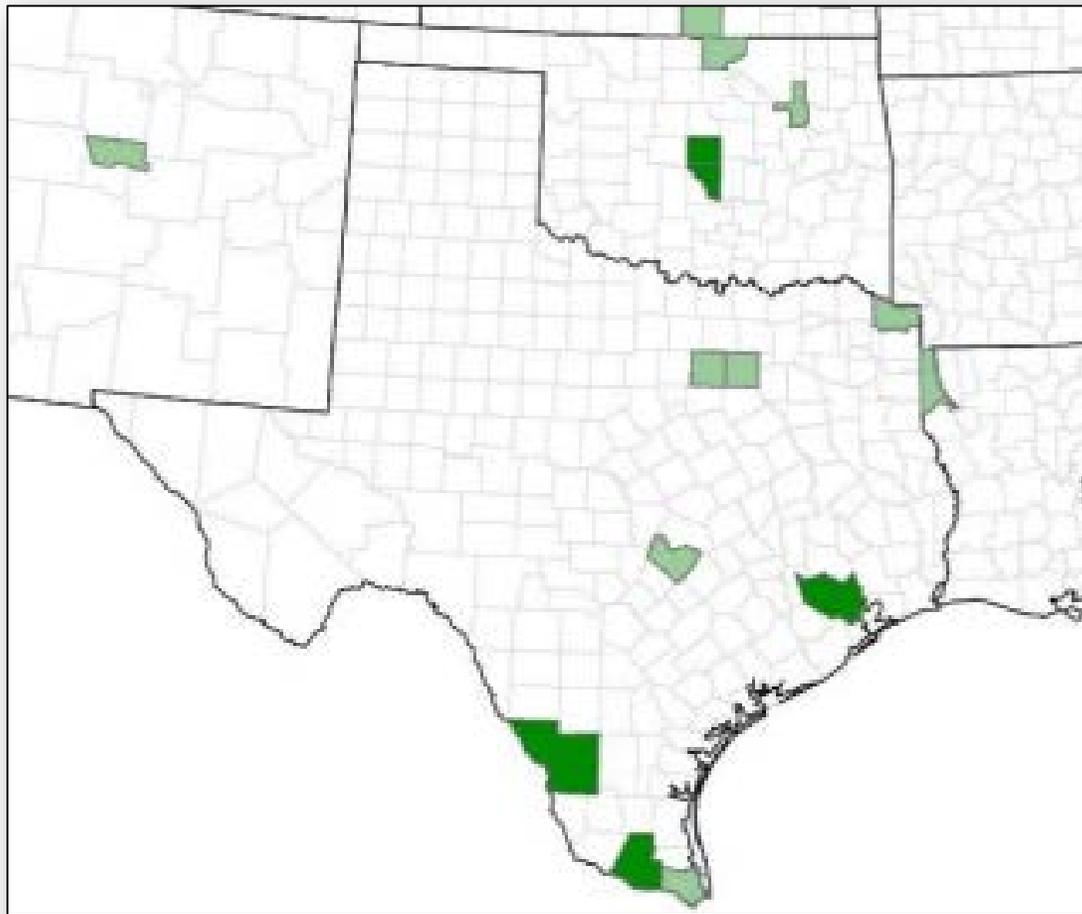
Current Standard & Proposed Revisions

| Current standards – Last revised in 2012 review* | | | Decisions in 2012 Review | Decisions in 2020 Review | Proposed Decisions in 2022 Re-consideration |
|--|------------------------|--|---|--------------------------|---|
| Standard | Level | Form | | | |
| Annual Primary PM _{2.5} | 12.0 µg/m ³ | Annual arithmetic mean, averaged over 3 years | Revised level from 15.0 to 12.0 µg/m ^{3**} | Retained | Revise level to 9.0-10.0 µg/m ³ <i>(comment on 8.0-11.0 µg/m³)</i> |
| Annual Secondary PM _{2.5} | 15.0 µg/m ³ | Annual arithmetic mean, averaged over 3 years | Retained** | Retained | Retain |
| 24-hour Primary & Secondary PM _{2.5} | 35 µg/m ³ | 98 th percentile, averaged over 3 years | Retained | Retained | Retain <i>(comment on as low as 25 µg/m³)</i> |
| 24-hour Primary & Secondary PM ₁₀ | 150 µg/m ³ | Not to be exceeded more than once per year on average over a 3-year period | Retained | Retained | Retain |

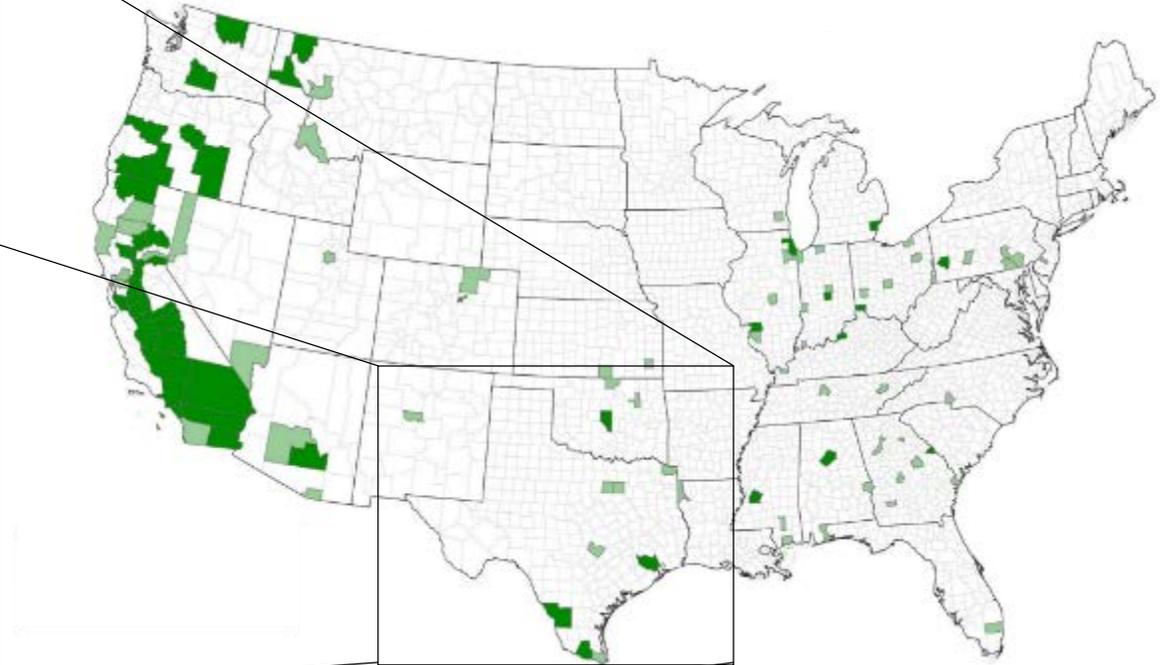
Public Comment & Hearings

- **Public comments are due by March 28**
- **EPA will conduct three virtual public hearings for this proposed rulemaking**
 - Wednesday, February 22; and Thursday, February 23 from 11:00 am - 7:00 pm Eastern
 - If you just want to watch the hearings, EPA will post a link to a livestream shortly before they start each day
- **Public comments can be submitted at <http://www.regulations.gov> by searching for Docket ID No. EPA-HQ-OAR-2015-0072**
- **For general information about the proposed PM NAAQS revision, please visit <https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm>**

Current Air Monitoring Data Show Some Counties Would Not Meet Proposed Primary Fine Particle Standards



(Based on 2019-2021 air monitoring data)

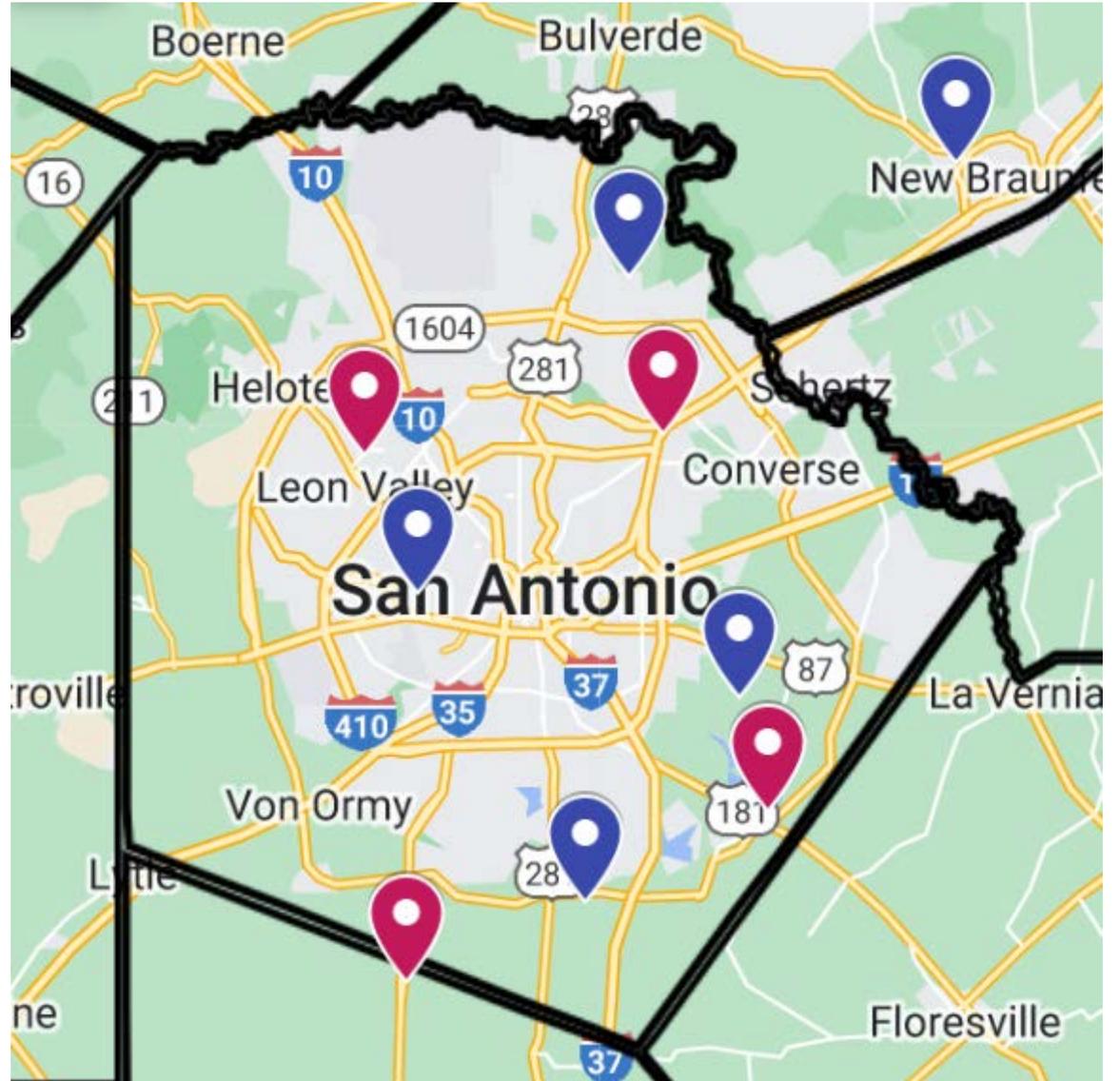


■ 10.0 µg/m³
■ 9.0 µg/m³

Area designations under proposed revised NAAQS will likely be based on monitoring data collected between 2021 and 2024

Fine Particulate Matter (PM_{2.5}) Monitors in the MSA

- Bexar County: 7 monitors
- Atascosa County: 1 monitor
- Comal County: 1 monitor



 Regulatory

 Non-Regulatory

Regulatory PM Monitor Compliance

| Regulatory Monitor | County | Most-recent certified data (2019-2021) | |
|-------------------------------------|----------|--|------------------------------|
| | | Annual mean PM _{2.5} | 24-hr mean PM _{2.5} |
| San Antonio NW CAMS 23 | Bexar | 8.8 µg/m ³ | 21.6 µg/m ³ |
| Calaveras Lake CAMS 59 | Bexar | 7.6 µg/m ³ | 20.6 µg/m ³ |
| San Antonio Interstate 35 CAMS 1069 | Bexar | 8.6 µg/m ³ | 20.0 µg/m ³ |
| Palo Alto Hwy 16 CAMS 1090 | Atascosa | Insufficient Data* | Insufficient Data* |

* CAMS 1090 will have sufficient data once 2023 data has been certified (May 2024)

| | |
|-----------------------------|------------------------------|
| 2021: 8.9 µg/m ³ | 2021: 22.4 µg/m ³ |
| 2022: 9.1 µg/m ³ | 2022: 27.2 µg/m ³ |

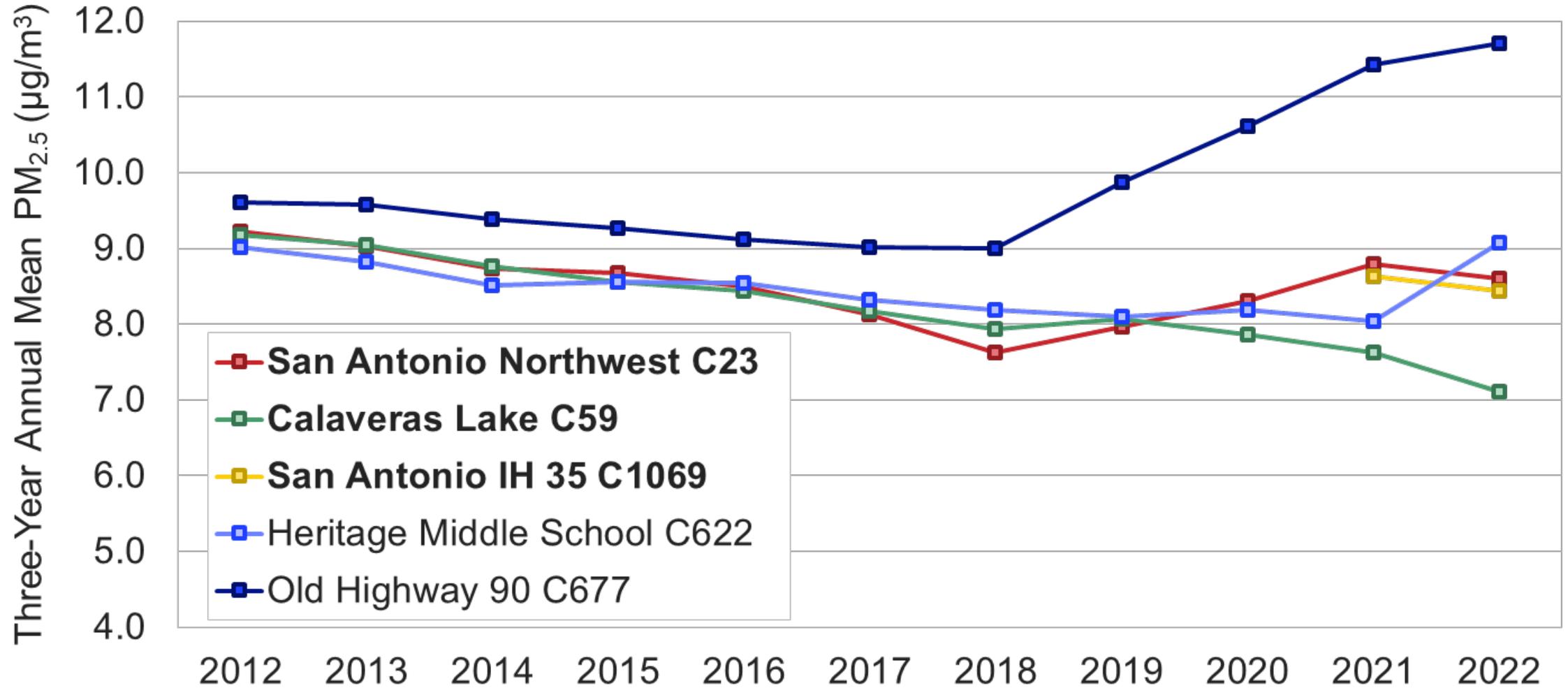


Other PM Monitors

| Non-Regulatory Monitor | County | Most-recent certified data (2019-2021) | |
|---------------------------------------|--------|--|------------------------------|
| | | Annual mean PM _{2.5} | 24-hr mean PM _{2.5} |
| Heritage Middle School CAMS 622 | Bexar | 8.0 µg/m ³ | 20.8 µg/m ³ |
| Old Highway 90 CAMS 677 | Bexar | 11.4 µg/m ³ | 24.7 µg/m ³ |
| San Antonio Bulverde Pkwy CAMS 1087* | Bexar | 7.6 – 7.7 – 8.4 | 20.0 – 19.2 – 25.8 |
| New Braunfels Oak Run Pkwy CAMS 1088* | Comal | 7.4 – 7.5 – 7.1 | 19.8 – 18.6 – 20.4 |
| San Antonio Red Hill Lane CAMS 1091* | Bexar | X – 8.1 – 7.9 | X – 20.1 – 22.4 |

* Insufficient data exists for a certified 2019-2021 average; values shown are for 2020, 2021, and 2022

Local Particulate Matter Trends



SIP Requirements by Classification

Moderate Areas:

- Attainment Demonstration or Impracticability Demonstration
- Base Year & Attainment Projected Emissions Inventories
- RACM/RACT
- Additional Reasonable Measures & Contingency Measures
- Reasonable Further Progress
- Quantitative Milestones
- Nonattainment NSR

SIP Requirements by Classification

Serious Areas:

- Attainment Demonstration
- Base Year & Attainment Projected Emissions Inventories
- BACM/BACT
- Additional Feasible Measures & Contingency Measures
- Reasonable Further Progress
- Quantitative Milestones
- Nonattainment NSR



Lyle Hufstetler

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San Antonio, Texas 78217



EPA Advance Program

- Federal, state, local, public, and private partners working together to take local action to reduce ozone and fine particulate matter to maintain compliance with the NAAQS
- EPA has wealth of resources to provide technical assistance, grant opportunities, collaboration, training, and more
- Regional Advance plans offer flexibility in scope and periodic updates encourage regular stakeholder participation

EPA Advance Program

- Beginning in 2022, AACOG will begin developing its first PM Advance Plan with regular input and participation from area stakeholders
- Plan will include:
 - PM Conceptual Model
 - Overview of Available Resources
 - Commitments from Alamo Area Air Quality Partners
- Bexar County no longer eligible to participate in Ozone Advance; will need to re-scope the report and recruit new participants from rural areas



EPA Advance Technical Assistance

- Mobile | Transportation
- Energy Efficiency | Renewable Energy | Climate
- Overall Planning | Green Infrastructure | Heat Island
- Education | Outreach | Grants | Program Management
- Stationary and Area Sources | Monitoring



Air Quality Committee

7.

Meeting Date: 02/22/2023

Title: Comment Letter to EPA regarding Proposed Particulate Matter NAAQS Revision

Presented by: Lyle Hufstetler, Natural Resources Project Coordinator

AGENDA ITEM DESCRIPTION:

Consider and act upon the recommendation to forward comments in response to the EPA Administrator's proposed revision of the Particulate Matter (PM) National Ambient Air Quality Standards (NAAQS) to the AACOG Board for their approval. - Lyle Hufstetler

BACKGROUND/HISTORY:

On January 27, 2023, the EPA proposed to revise the primary annual PM_{2.5} standard by lowering the level. The Agency proposed to retain the current primary 24-hour PM_{2.5} standard and the primary 24-hour PM₁₀ standard. The Agency also proposed not to change the secondary 24-hour PM_{2.5} standard, secondary annual PM_{2.5} standard, and secondary 24-hour PM₁₀ standard. The EPA also proposed revisions to other key aspects related to the PM NAAQS, including revisions to the Air Quality Index (AQI) and monitoring requirements for the PM NAAQS.

DISCUSSION:

In the comment letter, AACOG expresses concerns about the uncertainties remaining in the epidemiologic evidence that are used to support the proposed range of the PM NAAQS. AACOG staff proposes recommending EPA only lower the standard to 11.0 µg/m³. The latter expresses concern that lowering the annual PM_{2.5} standard below 11.0 µg/m³ would not improve public health because of these remaining uncertainties.

In addition, AACOG recommends the EPA collect more data on the impacts from short-term exposures to fine particulates to help reduce remaining uncertainties in the current epidemiological evidence. AACOG also supports the EPA's recommendation to increase monitoring of PM to account for potential impacts on at-risk populations, and recommends the EPA further research and address the impact of long distance transport of PM on local air quality.

FINANCIAL IMPACT:

None

STAFF RECOMMENDATION:

Staff recommends the comment letter to be forwarded to the AACOG Board for their approval. For questions, please contact Lyle Hufstetler at lhufstetler@aacog.com or 210-376-9901.

Attachments

AACOG Comment Letter to EPA



Board of Directors

- James E. Teal, Chair**
County Judge, McMullen County
- Rob Kelly, Vice Chair**
County Judge, Kerr County
- James Blakey**
Councilman, City of New Braunfels
- Mario Bravo**
Councilman, City of San Antonio
- Tommy Calvert**
Commissioner, Bexar County
- Rochelle Camacho**
County Judge, Frio County
- Rebeca Clay-Flores**
Commissioner, Bexar County
- Victor Contreras**
Mayor, City of Marion
- Weldon Cude**
County Judge, Atascosa County
- Suzanne de Leon**
Mayor, City of Balcones Heights
- Mary Dennis**
Mayor, City of Live Oak
- Richard A. Evans**
County Judge, Bandera County
- Judy Eychner**
Mayor, City of Kerrville
- Dr. Adriana Rocha Garcia**
Councilwoman, City of San Antonio
- James Hasslocher**
Board Member, University Health System
- Wade Hedtke**
County Judge, Karnes County
- Daniel Jones**
County Judge, Gillespie County
- Sherman Krause**
County Judge, Comal County
- Kyle Kutscher**
County Judge, Guadalupe County
- Lisa Lewis**
Chief Administrative Officer, CPS Energy
- Keith Lutz**
County Judge, Medina County
- Jose Menendez**
State Senator, District 26
- Grant Moody**
Commissioner, Bexar County
- Andrew Murr**
State Representative, District 53
- Manny Pelaez**
Councilman, City of San Antonio
- Darrin Schroeder**
Mayor, City of Castroville
- Shane Stolarczyk**
County Judge, Kendall County
- Sylvester Vasquez**
President, Southwest ISD
- Enrique Valdivia**
Chair, Edwards Aquifer Authority
- Hank Whitman**
County Judge, Wilson County
- John Williams**
Mayor, City of Universal City
- Ryan Guillen (Ex-Officio)**
State Representative, District 31
- Brian Hoffman (Ex-Officio)**
Joint Base San Antonio
- John Kuempel (Ex-Officio)**
State Representative, District 44
- Judith Zaffirini (Ex-Officio)**
State Senator, District 21

February 22, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
EPA Docket Center
Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter; EPA-HQ-OAR-2015-0072; FRL-8635-01-OAR (January 27, 2023)

Dear Administrator Regan:

The Alamo Area Council of Governments (AACOG) Board of Directors appreciates the opportunity to comment on the Environmental Protection Agency's Proposed Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM).

The Alamo Area Council of Governments was established in 1967 as a political subdivision of the State of Texas, under Chapter 391 of the Local Government Code. AACOG is a voluntary association of local governments and organizations that serves its members through planning, information, and coordination activities. AACOG serves as the air quality planning authority for State Planning Region 18, covering Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Medina, McMullen and Wilson counties. The AACOG Board of Directors is the governing body for the agency.

On January 27, 2023, the EPA proposed to revise the primary annual PM_{2.5} standard by lowering the level. The Agency proposed to retain the current primary 24-hour PM_{2.5} standard and the primary 24-hour PM₁₀ standard. The Agency also proposed not to change the secondary 24-hour PM_{2.5} standard, secondary annual PM_{2.5} standard, and secondary 24-hour PM₁₀ standard. The EPA also proposed revisions to other key aspects related to the PM NAAQS, including revisions to the Air Quality Index (AQI) and monitoring requirements for the PM NAAQS.

AACOG would like to express concerns about the uncertainties remaining in the epidemiological evidence that are used to support the proposed range of the PM NAAQS. AACOG would also like to express general support for EPA's intended revision of the primary PM_{2.5} standard with the following comments:

- While AACOG supports the protection of public health and public welfare by setting the PM NAAQS in accordance with the best available science, AACOG agrees with the Clean Air Scientific Advisory Committee (CASAC) statement that uncertainties remain in the current epidemiological evidence.
- AACOG is concerned that lowering the annual PM_{2.5} standard below 11.0 µg/m³ would not improve public health because of these remaining uncertainties.
- AACOG supports EPA's proposal not to change the current secondary annual PM_{2.5} standard, the primary and secondary 24-hour PM_{2.5} standards, and the primary and secondary PM₁₀ standards. There are uncertainties remaining in the current epidemiological evidence that reducing these standards would support the protection of public health and public welfare
- AACOG also recommends the EPA collect more data on the impacts from short term exposures to fine particulates to help reduce remaining uncertainties in the current epidemiological evidence.
- AACOG agrees with the CASAC draft assessment dated 2/4/22 that there are large populations at risk of PM_{2.5} health effects, and that there are disparities in risk across various population subgroups.
- AACOG also supports the EPA's recommendation to increase monitoring of PM to account for potential impacts on at-risk populations.
- AACOG also recommends the EPA further research and address the impact of long distance transport of PM on local air quality.
- Although AACOG supports a lowering of the primary annual PM_{2.5} NAAQS, due to the lack of CASAC consensus, AACOG recommends the standard be lowered from 12.0 µg/m³ to 11.0 µg/m³.

In addition, the San Antonio-New Braunfels-Pearsall, TX CSA has a long history of being proactive in limiting PM pollution without being subject to federal regulations associated with PM nonattainment. A number of local voluntary initiatives have been implemented, frequently with public-private partnerships, which have reduced PM in the region. Some of these initiatives include enacting anti-idling ordinances in Bexar County and the cities of San Antonio and Leon Valley; a decades-long Save For Tomorrow Energy Plan (STEP) from CPS Energy to reduce demand for electricity generated by coal-fired power plants; participating in the Texas Emission Reduction Program (TERP) to facilitate turnover of older and dirtier diesel engines; installing selective non-catalytic reduction at cement kilns; and investments in the latest technology by both the energy industry in the Eagle Ford shale and the cement industry to reduce PM emissions.

To summarize, AACOG is concerned about the EPA lowering the standard with uncertainties remaining in the current epidemiological evidence. With these uncertainties present, AACOG argues that reducing the primary annual PM_{2.5} NAAQS below 11.0 µg/m³ may not provide additional support for the protection of public health and public welfare. AACOG supports the EPA's recommended proposal not to change the current secondary annual PM_{2.5} standard, the primary and secondary 24-hour PM_{2.5} standards, and the primary and secondary PM₁₀ standards. AACOG also recommends the EPA further address the impact of long distant transport of PM on local air quality.

Please let us know if you have any questions regarding our comments, and we look forward to working with EPA in the future.

Signed,

James E. Teal,
County Judge, McMullen County
Chair, AACOG Board of Directors

CC: The Honorable Greg Abbott, Governor, State of Texas
The Honorable John Cornyn, Senator, U.S. Senate
The Honorable Ted Cruz, Senator, U.S. Senate
The Honorable Joaquin Castro, Congressman, U.S. Congressional District 20
The Honorable Chip Roy, Congressman, U.S. Congressional District 21
The Honorable Tony Gonzales, Congressman, U.S. Congressional District 23
The Honorable Henry Cuellar, Congressman, U.S. Congressional, District 28
The Honorable Greg Casar, Congressman, U.S. Congressional District 35
The Honorable Roland Gutierrez, Senator, Texas Senate District 19
The Honorable Judith Zaffirini, Senator, Texas Senate District 21
The Honorable Pete Flores, Senator, Texas Senate District 24
The Honorable Donna Campbell, Senator, Texas Senate District 25
The Honorable José Menéndez, Senator, Texas Senate District 26
The Honorable Tracy O. King, Representative, Texas House District 80
The Honorable Trey Martinez Fischer, Representative, Texas House District 116
The Honorable Philip Cortez, Representative, Texas House District 117
The Honorable John Lujan, Representative, Texas House District 118
The Honorable Elizabeth Campos, Representative, Texas House District 119
The Honorable Barbara Gervin-Hawkins, Representative, Texas House District 120
The Honorable Steve Allison, Representative, Texas House District 121
The Honorable Mark Dorazio, Representative, Texas House District 122

The Honorable Diego Bernal, Representative, Texas House District 123
The Honorable Josey Garcia, Representative, Texas House District 124
The Honorable Ray Lopez, Representative, Texas House District 125
The Honorable Peter Sakai, County Judge, Bexar County
The Honorable Weldon P. Cude, County Judge, Atascosa County
The Honorable Jon Niermann, Chairman, Texas Commission on Environmental Quality

Air Quality Committee

8.

Meeting Date: 02/22/2023

Title: Ozone Report

Presented by: Steven Smeltzer, Environmental Manager

AGENDA ITEM DESCRIPTION:

Receive an update on the ozone season, including a recap of 2022 and what to expect for 2023. - Steven Smeltzer

BACKGROUND/HISTORY:

In October 2015, the U.S. Environmental Protection Agency (EPA) promulgated its revised National Ambient Air Quality Standards (NAAQS) for ground-level ozone. The annual fourth-highest maximum daily average 8-hour (MDA8) ozone concentration, averaged over three years, measured at each regulatory monitor within an area must not exceed 70 parts per billion (ppb).

Bexar County has been designated nonattainment under the 2015 ozone NAAQS since September 24, 2018, which triggered a three-year deadline to attain the NAAQS by September 24, 2021 (attainment date), or effectively, the end of the 2020 ozone season (attainment year). Bexar County missed its attainment date based on having a 2020 design value of 72 ppb, and was reclassified to moderate nonattainment on November 7. If Bexar County does not attain the NAAQS by September 24, 2024 (or the end of the 2023 ozone season), it will face another reclassification to serious nonattainment.

DISCUSSION:

The 2023 ozone season will begin on March 1. Two ozone monitors continue to show violations of the ozone NAAQS, and it is highly unlikely that either of them will attain the standard by the end of 2023.

Last year the number of high ozone days was above average. This included ten consecutive Ozone Action Days, which was a record for the San Antonio region.

The EPA is currently reconsidering a 2020 decision not to revise the ozone NAAQS. An announcement is expected by the end of 2023.

FINANCIAL IMPACT:

This item does not require a budget amendment. (Non-financial impact)

STAFF RECOMMENDATION:

For questions, please contact Steven Smeltzer at ssmeltzer@aacog.com or 210-362-5203.

Attachments

Ozone Report & NAAQS Update



AACOG
Alamo Area Council
of Governments

OZONE REPORT & NAAQS UPDATE

Presented to AACOG Air Quality Committee
Presented by Steven Smeltzer and Lyle Hufstetler
February 22, 2023

2022 Ozone Season by Month

| Month | Actual 2022 Days Ozone > 70 ppb | Average Days Ozone > 70 ppb |
|--------------|---|---|
| April | 0 | 1 |
| May | 0 | 1 |
| June | 1 | 1 |
| July | 0 | 1 |
| August | 1 | 1 |
| September | 5 | 2 |
| October | 3 | 2 |
| Total | 10 | 8 |

* Data for 2022 will be certified by EPA no later than May 2023

2022 Ozone Action Day Alerts

| | |
|--|-----------|
| Days alert was issued | 19 |
| Days alert verified | 6 |
| Days with > 70 ppb | 10 |
| Days with > 70 ppb without alert | 4 |

**Ten consecutive Ozone Action Day alerts were issued
Sept. 28 – Oct. 7, 2022**

Ozone Action Day Alerts are issued by TCEQ when high ozone levels are expected to occur the following day.

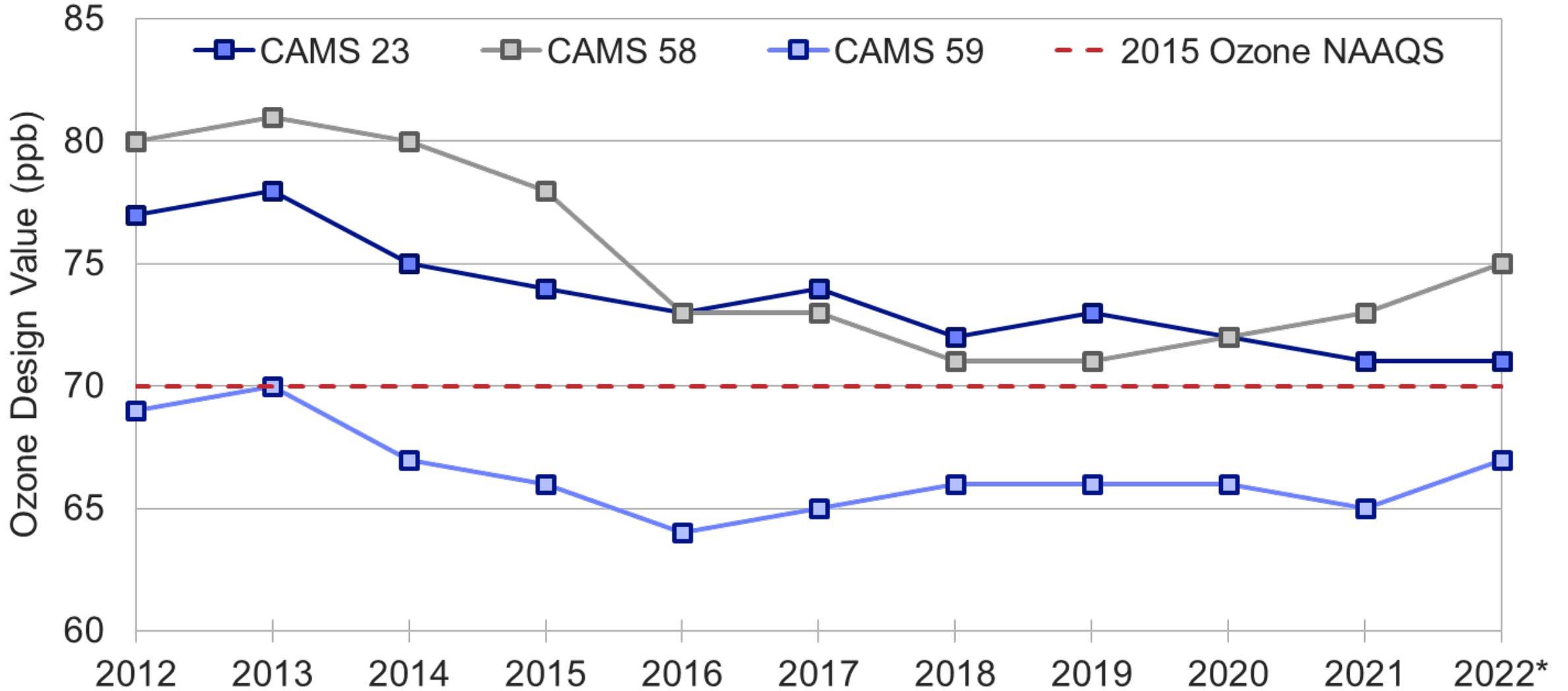
- Sign up to receive these alerts at <http://www.aacog.com/list.aspx>

Current Three-Year Average

| Monitor Site | 4 th Highest 8-Hour Average O ₃ (ppb) | | | Three-Year Average* |
|----------------------------|---|------|-------|---------------------|
| | 2020 | 2021 | 2022* | |
| San Antonio Northwest, C23 | 69 | 70 | 76 | 71 |
| Camp Bullis, C58 | 74 | 78 | 75 | 75 |
| Calaveras Lake C59 | 66 | 66 | 70 | 67 |

Two Bexar County regulatory monitors continue to violate the 2015 standard

Design Value Trend

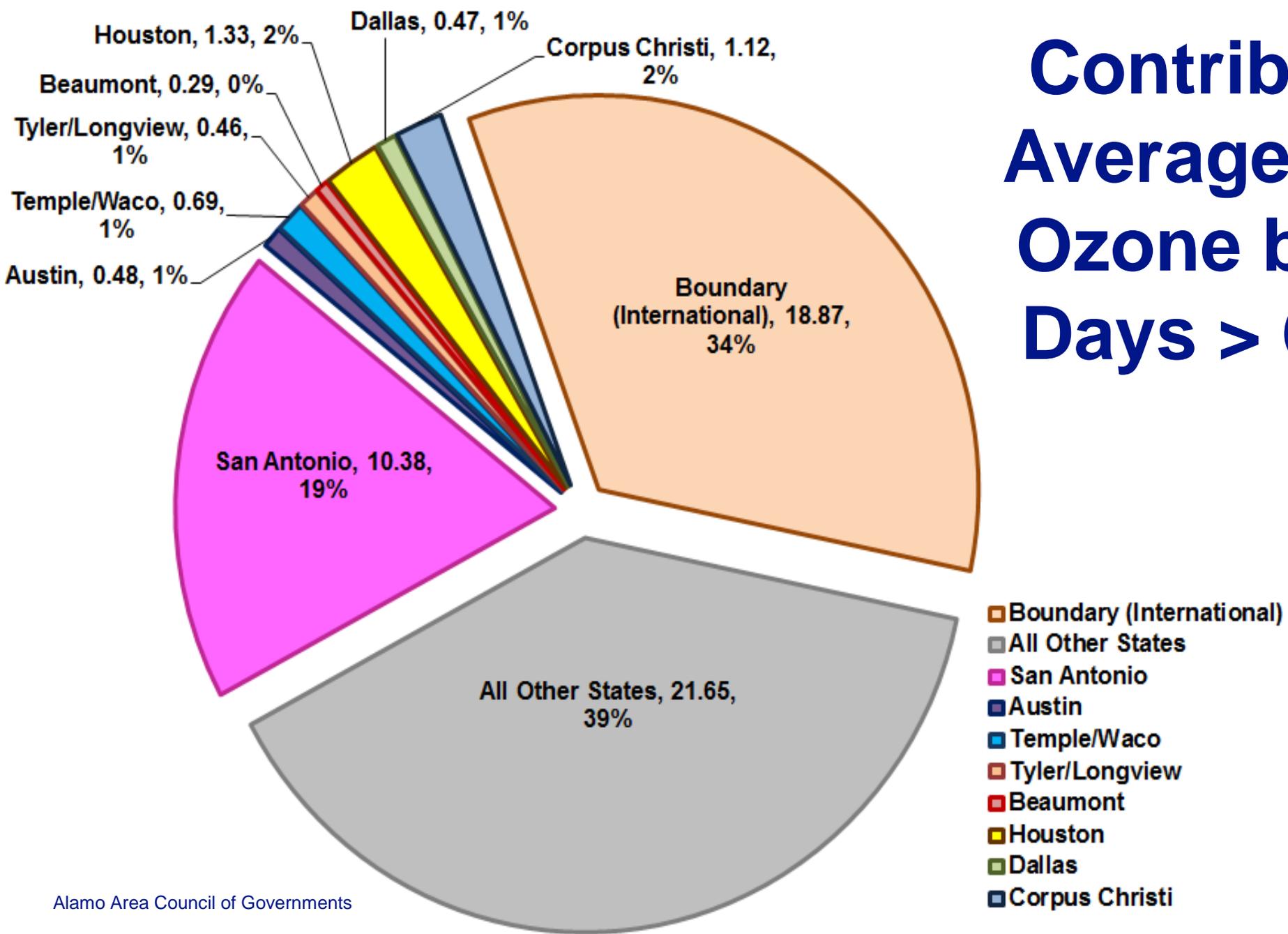


Attaining the NAAQS in 2023

| Monitor Site | 4 th -Highest 8-Hour Average O ₃ (ppb) | | 2023 Maximum Allowable 4 th -Highest to Attain Standard |
|----------------------------|--|-------|--|
| | 2021 | 2022* | |
| San Antonio Northwest, C23 | 70 | 76 | 66 |
| Camp Bullis, C58 | 78 | 75 | 59 |
| Calaveras Lake, C59 | 66 | 70 | 76 |

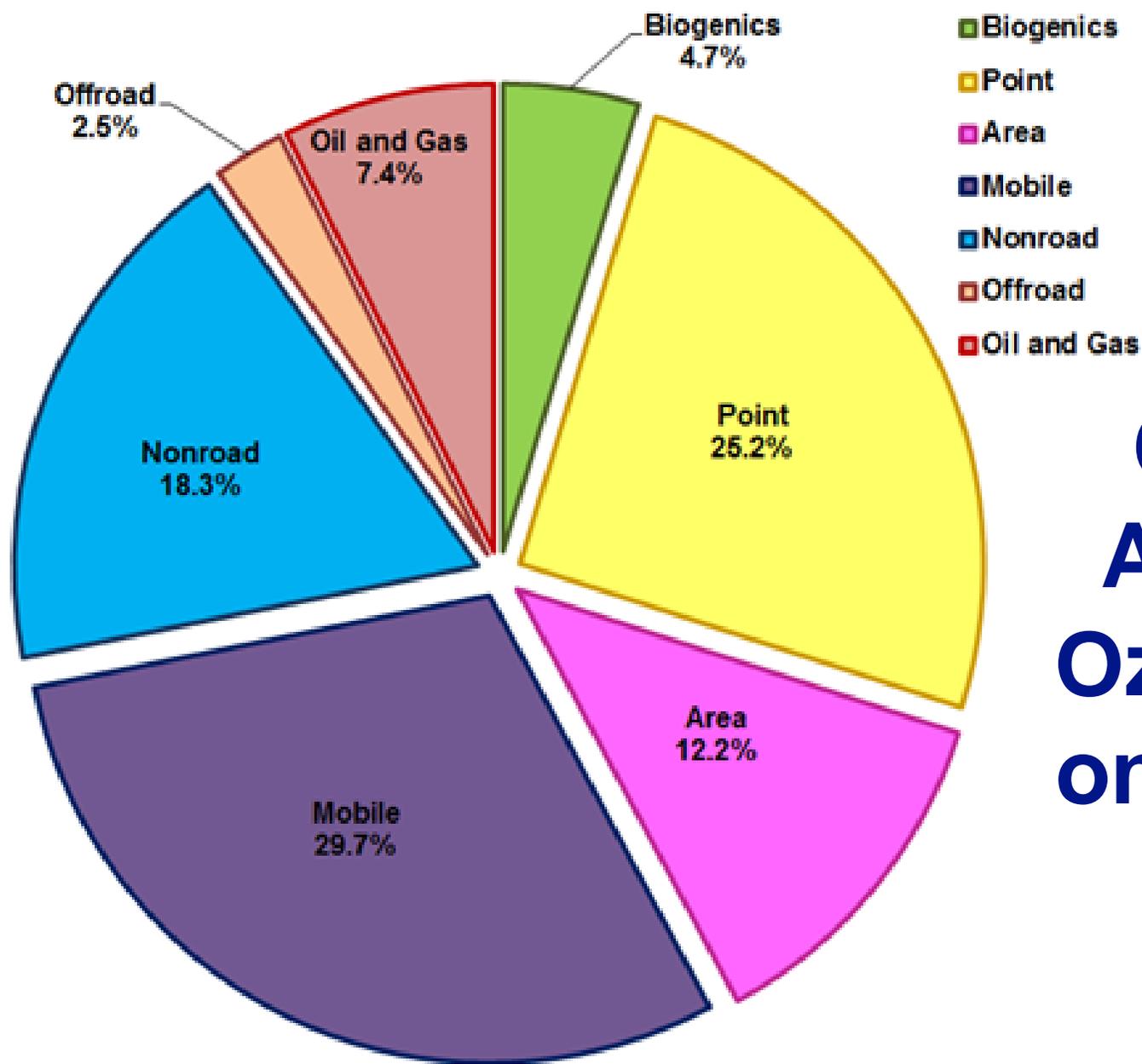
It will be very difficult to attain the standard by the end of 2023

Contribution to C58 Average Peak 8-Hour Ozone by Region on Days > 60 ppb, 2023



Alamo Area Council of Governments

Based on the April 16 to September 30, 2012 model runs completed in 2019



Contribution to C58 Average Peak 8-Hour Ozone by Local Source on Days > 60 ppb, 2023



Lyle Hufstetler Steven Smeltzer

Contac:

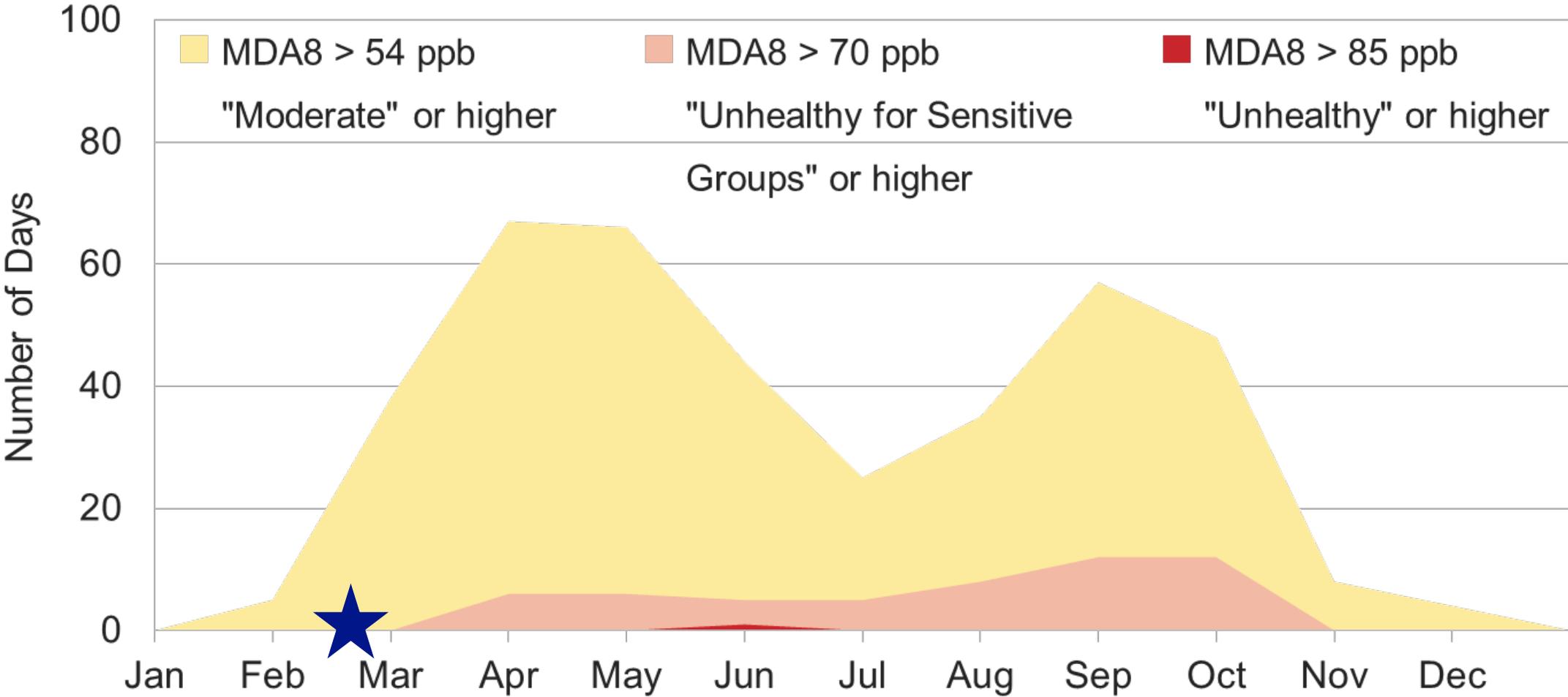
Phone: 210-362-5225

Email: lhufstetler@aacog.com
ssmeltzer@aacog.com

2700 NE Loop 410, Suite 101
San Antonio, Texas 78217



Seasonal Ozone Variation



2022 Four-Highest

| Monitor | Date | ppb | Date | ppb | Date | ppb | Date | ppb |
|--------------------|------|-----|------|-----|------|-----|------|-----|
| SA Northwest C23 | 9/30 | 79 | 6/29 | 79 | 10/1 | 77 | 10/6 | 76 |
| Camp Bullis C58 | 10/6 | 76 | 10/1 | 75 | 9/30 | 75 | 6/29 | 75 |
| Calaveras Lake C59 | 6/29 | 78 | 9/29 | 74 | 9/30 | 70 | 8/12 | 70 |

* Ozone data validated through November 2022

2022 ended with 70 moderate days (> 54 ppb) and 10 days > 70 ppb



2023 Four-Highest

| Monitor | Date | ppb | Date | ppb | Date | ppb | Date | ppb |
|--------------------|------|-----|------|-----|------|-----|------|-----|
| SA Northwest C23 | 4/3 | 46 | 3/26 | 45 | 3/25 | 45 | 3/1 | 44 |
| Camp Bullis C58 | 4/3 | 48 | 3/26 | 47 | 3/25 | 46 | 3/16 | 45 |
| Calaveras Lake C59 | 3/25 | 51 | 3/1 | 47 | 4/2 | 45 | 3/16 | 44 |

* As of May 16; Ozone data validated through January 2022

2022 to date: 23 moderate ozone days (> 54 ppb); no days > 70 ppb

March was above average, April and May-to-date have been below average

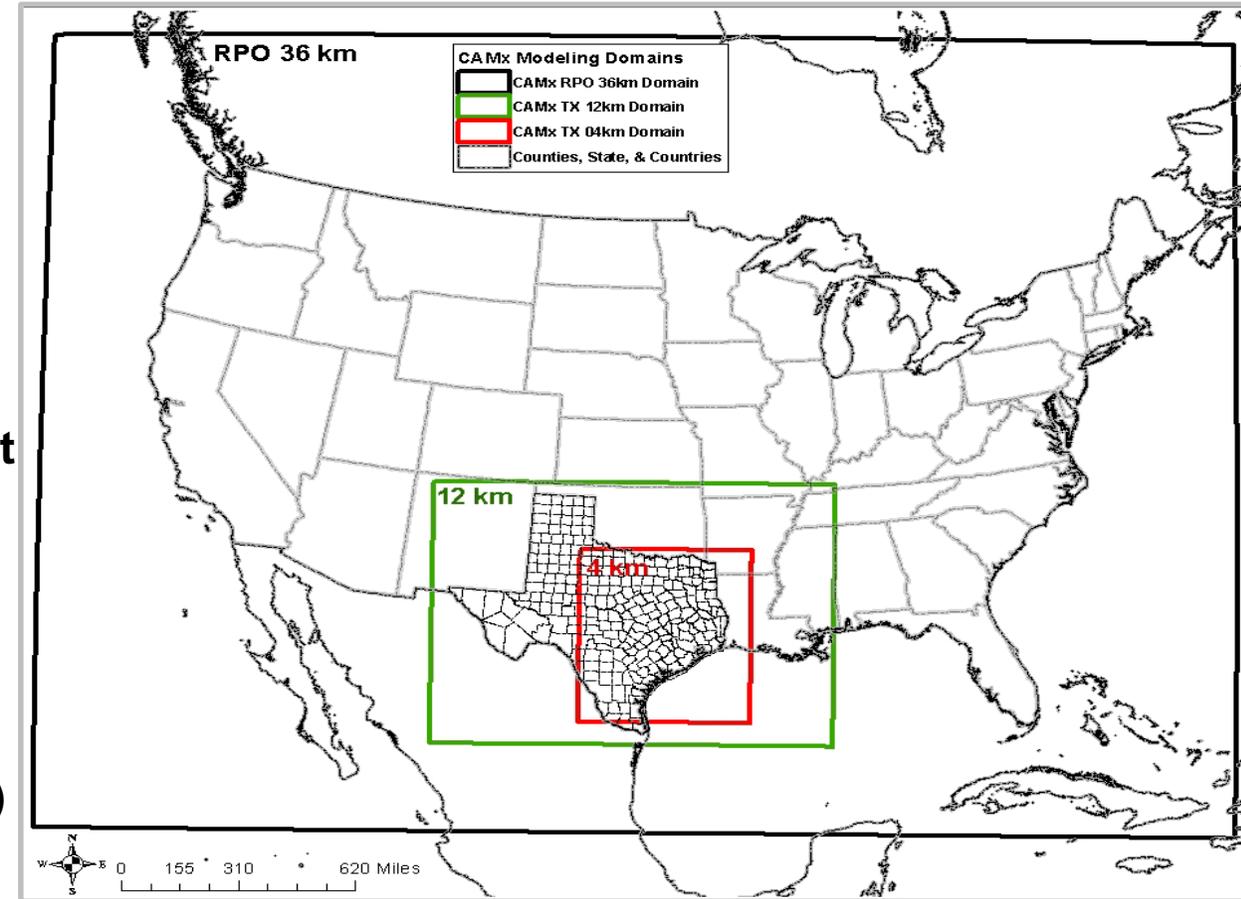
Current fourth-highest at C58 exceeds the maximum allowable to attain the standard



Ozone Season 2012 Photochemical Modeling

Episode Metadata

- WRF v3.71 Meteorological Model, CAMx 6.4
- Version 6 of the Carbon Bond photochemical mechanism (CB6)
- Modeling Days:
 - 91 primary episode days, May 16 – June 30 and Aug. 16 to Sept. 30, 2012
- During the episode, 8-hour ozone exceeded 60 ppb at a regulatory monitor 39 Days (for APCA runs)
- Base line 2012 emissions were projected to 2023
- TCEQ approved Local EI
- Chemistry solver: EBI (Euler-Backward Iterative)
- Advection solver: PPM (Piecewise Parabolic Method)
- Dry deposition model: WESELY89



Air Quality Committee

9.

Meeting Date: 02/22/2023

Title: Consequences of Ozone Nonattainment

Presented by: Steven Smeltzer, Environmental Manager

AGENDA ITEM DESCRIPTION:

Receive an update on the potential consequences of ozone nonattainment. - Steven Smeltzer

BACKGROUND/HISTORY:

In October 2015, the U.S. Environmental Protection Agency (EPA) promulgated its revised National Ambient Air Quality Standards (NAAQS) for ground-level ozone. The annual fourth-highest maximum daily average 8-hour (MDA8) ozone concentration, averaged over three years, measured at each regulatory monitor within an area must not exceed 70 parts per billion (ppb). Bexar County was initially designated nonattainment with a marginal classification on September 24, 2018, and given three years to come into compliance, or risk being reclassified to moderate nonattainment.

DISCUSSION:

On November 7, the EPA reclassified Bexar County as moderate nonattainment. This introduced a series of new and more stringent Federal regulations intended to improve local air quality. If Bexar County doesn't attain the NAAQS by the end of the 2023 ozone season, it will face another reclassification to serious nonattainment. With each increasing classification level, the number of regulations increases, and regulations already in place are made more stringent.

FINANCIAL IMPACT:

None

STAFF RECOMMENDATION:

For questions, please contact Steven Smeltzer at ssmeltzer@aacog.com or 210-362-5203.

Attachments

Potential Consequences of Ozone Nonattainment



AACOG
Alamo Area Council
of Governments

Potential Consequences of Ozone Nonattainment

Presented by
Steven Smeltzer | Environmental Manager | AACOG
for
Air Quality Committee | February 22, 2023



Current Attainment Status

- **Bexar County was originally designated nonattainment on Sept. 24, 2018**
- **States must develop a State Implementation Plans (SIP)**
- **On November 7, 2022, the EPA reclassified Bexar County from marginal to moderate nonattainment**
- **Triggers 1) additional regulations intended to improve local ozone, and 2) a tightening of existing regulations**
- **If Bexar County does not attain the standard by the next attainment date of September 24, 2024, the county could be reclassified to serious nonattainment (Unlikely to achieve the standard)**



Moderate Nonattainment SIP Timeline

| | |
|----------------------|---|
| July, 2018 | EPA declared Bexar County Marginal Nonattainment |
| Dec. 31, 2021 | Bexar County failed to meet the 70 ppb standard (2019-2021) |
| Nov. 7, 2022 | EPA reclassified Bexar County from marginal to moderate nonattainment |
| Jan. 1, 2023 | Moderate nonattainment Texas State Implementation Plan (SIP) revision was due to EPA |
| May, 2023 | TCEQ plans to submit the SIP for public comment |
| Dec. 31, 2023 | TCEQ target for Moderate SIP submittal |

Serious Reclassification Timeline

| | |
|-----------------------|--|
| Sept. 24, 2024 | Moderate attainment date for Bexar County with a 2023 attainment year (2021-2023) – unlikely to achieve |
| Fall 2025 | Potential reclassification to serious nonattainment |
| Jan. 1, 2026 | Serious nonattainment SIP revision due to EPA (moderate SIP controls will be in the process of being implemented) |
| Nov. 7, 2026 | Deadline to implement Inspection and maintenance (I/M) program for Bexar County |
| Sept. 24, 2027 | Serious attainment date for Bexar County with a 2026 attainment year (2024-2026) – severe nonattainment |

Requirements for Moderate Nonattainment

- **Meet all requirements for marginal areas: conformity, emission inventory, and new source review**
- **Inspection and Maintenance (I/M): Tests emissions-related components on gasoline vehicles 2-24 years old**
- **RACT/RACM: The lowest control technology that is reasonably available considering technological and economic feasibility**
- **Must show 15% reduction in volatile organic compounds (VOCs)**

Requirements for Moderate Nonattainment

- **Require 1.15 to 1 offsets for all new or modified sources with the potential to emit more than 100 tons. (Offset ratio: 1.15 = Additional 15% emission reductions over project emissions)**
- **Emissions reductions included in a SIP are sufficient to attain by the NAAQS attainment date**
- **Contingency measures – implemented without further rulemaking, if necessary**



Inspection & Maintenance (I/M)

- **I/M programs identify and repair high-emitting vehicles to improve air quality**
- **Every gasoline vehicle is inspected annual. (2-24 years old vehicles)**
- **I/M program implementation by November 7, 2026**
- **Plug in to on-board computer (OBD) to test emissions-related components and systems of the vehicle, adding ~15 minutes**
- **Inspection fee will be proposed by the state mid-year, with a 30-day public comment period. The expected additional charge is \$11.50**
- **Bexar County only**



I/M Assistance

- **Vehicles must successfully pass the emissions test in order to obtain a vehicle registration sticker**
- **Must use a recognized emission repair facilities to repair the vehicle**
- **Four waivers are available: (1. low income time extension for one year, 2. individual vehicle waiver after spending at least \$600 on repairs, 3. low mileage waiver, and parts availability time extension)**
- **DPS will create waiver stations in Bexar County**
- **San Antonio and Bexar county are looking at ways to help fund some of the vehicle repairs**



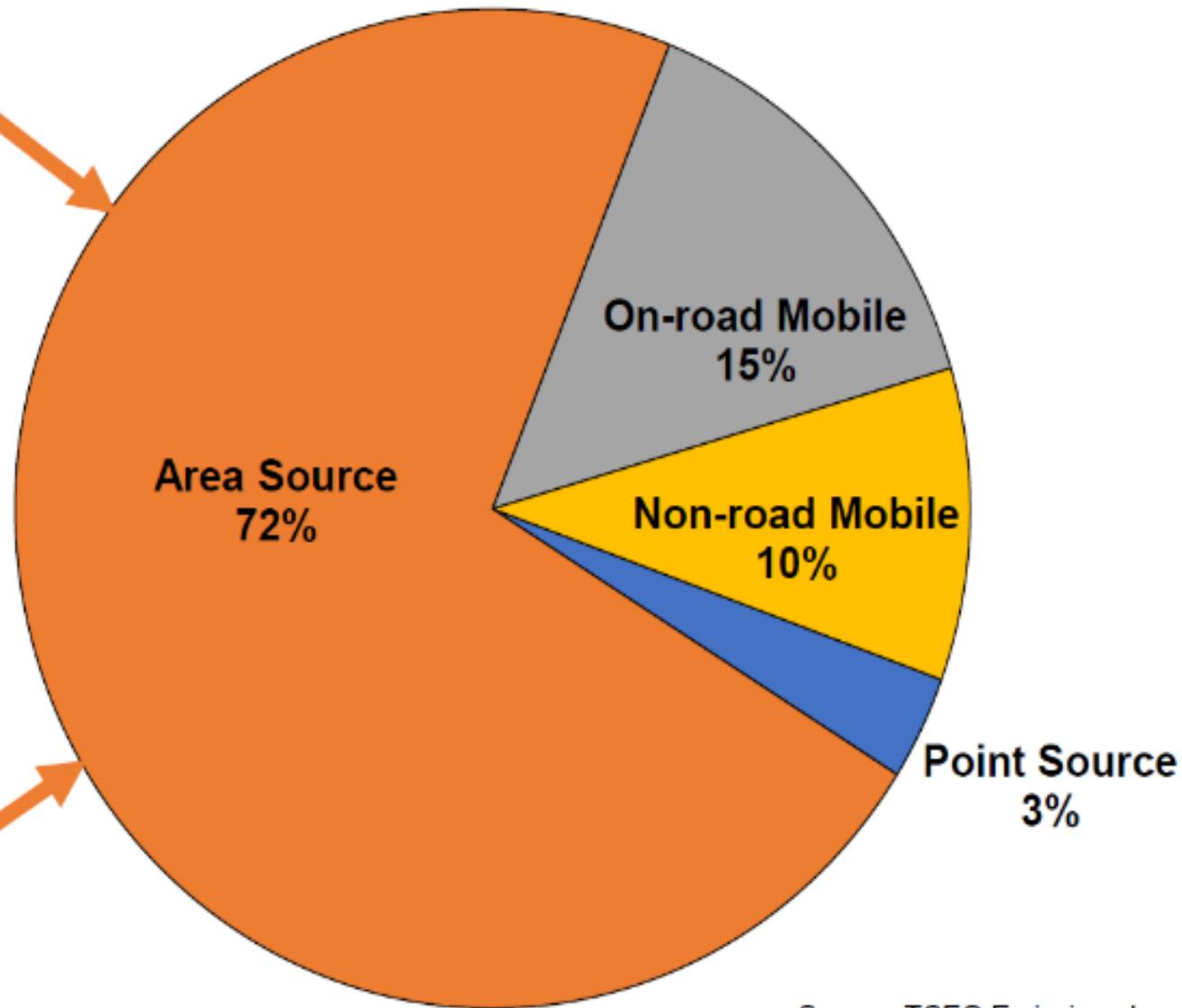


Volatile organic compound (VOC)

- **The main sources of Volatile organic compound (VOC) are consumer and commercial products including:**
 - **paints and other solvents,**
 - **aerosol sprays,**
 - **cleansers and disinfectants,**
 - **stored fuels and automotive products,**
 - **dry-cleaned clothing, and**
 - **pesticide**
- **Must show 15% reduction in VOCs by 2023**
- **Extremely difficult to achieve**

Components of VOC Area Sources

| Area Source Category | % of Total VOC |
|---|----------------|
| Surface Coating: Finished Metals | 10% |
| Gasoline Service Stations | 8% |
| Consumer Personal Care Products | 8% |
| Surface Coating: Architectural Coatings | 8% |
| Consumer Household Products | 7% |





Steven Smeltzer

Environmental Manager, AACOG

Email: ssmeltzer@aacog.com

2700 NE Loop 410, Suite 101

San Antonio, Texas 78217



Requirements for Serious Nonattainment

- **Meet all requirements for moderate areas**
- **Reduce definition of a major source and conformity threshold from 100 tons per year to 50 tons per year**
- **Reduce VOCs 3% annually for years 7 to 9 after the 15% reduction already required by year 6**
- **Require fleet vehicles to use clean alternative fuels**
- **Adopt transportation control measures if the number of vehicle miles traveled in the area is greater than expected**
- **Require 1.2 to 1 offsets**
- **Adopt additional contingency measures if the area does not meet required VOC reductions**



Nonattainment Boundary

- **EPA designates a region as nonattainment if it is violating the standard or if it is contributing to a violation of the standard in a nearby area**
- **EPA considers the counties in the combined statistical area (CSA)– San Antonio-New Braunfels-Pearsall, TX CSA - 9 county region**
- **EPA does not intend the CSA to be the nonattainment boundary; nonattainment boundaries may be smaller or larger than the CSA**
- **Currently only Bexar County is designated as nonattainment in the AACOG region**
- **All regulatory ozone monitors are located in Bexar county**
- **Atascosa County could potentially be declared nonattainment for particulate matter (PM)**



State Implementation Plans

- A state's comprehensive, enforceable plan to meet the NAAQS produced by Texas Commission on Environmental Quality (TCEQ)
- Revised as needed to comply with NAAQS requirements (e.g., new source review, emission inventories, control strategies, permitting, modeling, etc.)
- Developed with participation from stakeholders through meetings, comment periods, and public hearings



Ozone Attainment Status in Texas

| Region | Primary NAAQS | Designation | Counties | Attainment Deadline |
|-------------|------------------------------|------------------------|--|---------------------|
| Houston | 0.070 ppm (2015 standard) | Moderate Nonattainment | Brazoria, Chambers, Fort Bend, Galveston, Harris, Montgomery | 8/3/2024 |
| | 0.075 ppm (2008 standard) | Severe Nonattainment | Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller | 7/20/2027 |
| Dallas | 0.070 ppm (2015 standard) | Moderate Nonattainment | Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Tarrant, Wise | 8/3/2024 |
| | 0.075 ppm (2008 standard) | Severe Nonattainment | Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise | 7/20/2027 |
| El Paso | 0.070 ppm (2015 standard) | Marginal Nonattainment | El Paso | 8/3/2021 |
| San Antonio | 0.070 ppm (2015 standard) | Moderate Nonattainment | Bexar | 9/24/2024 |

Requirements for PM Nonattainment

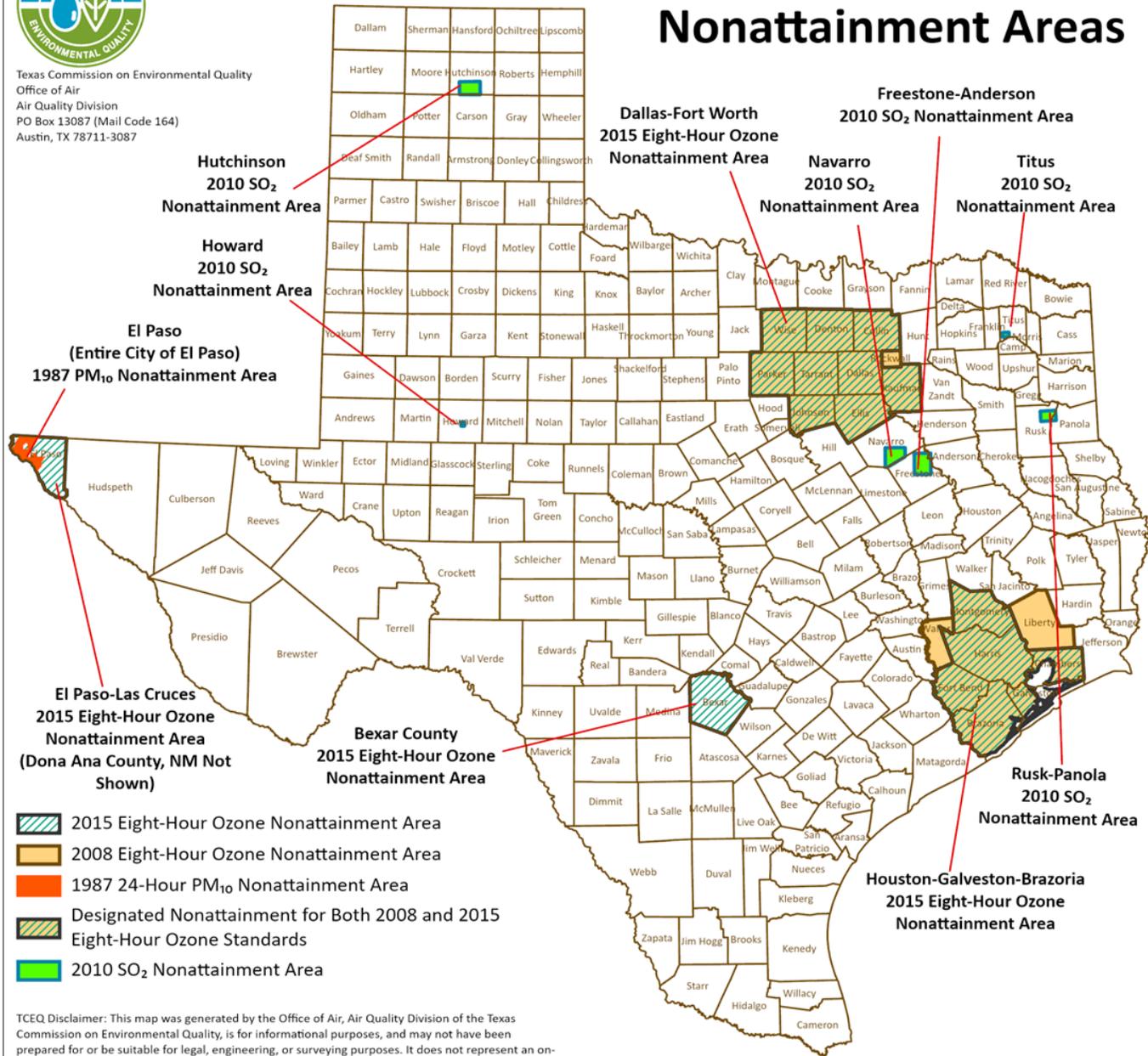
Moderate Nonattainment

- **RACM/RACT**
- **Additional Reasonable Measures**
- **Reasonable Further Progress**
- **Quantitative Milestones**
- **Contingency Measures**
- **Nonattainment NSR (100 tons per year) with a ratio of at least 1 to 1**



Texas Commission on Environmental Quality
Office of Air
Air Quality Division
PO Box 13087 (Mail Code 164)
Austin, TX 78711-3087

Texas Air Quality Nonattainment Areas



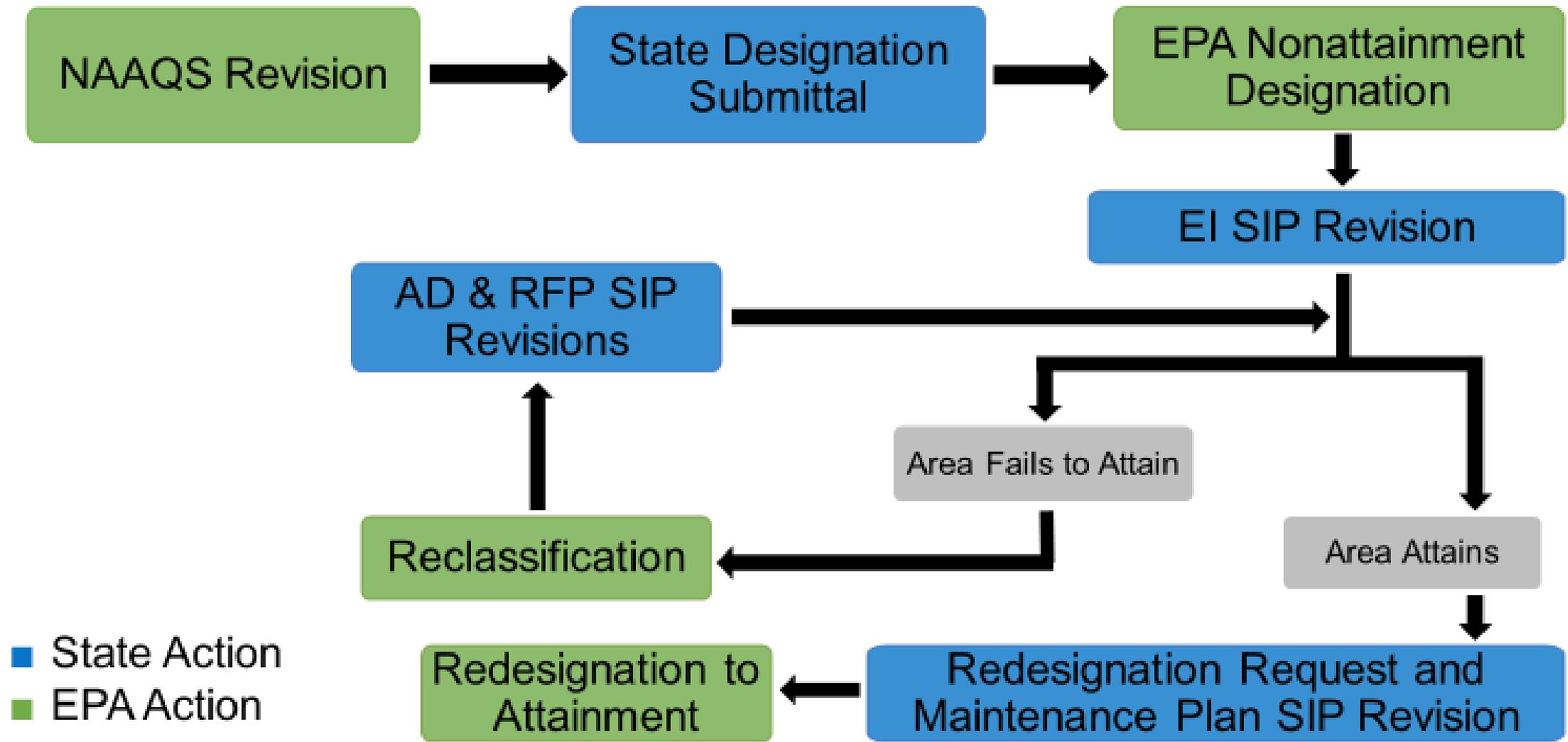
TCEQ Disclaimer: This map was generated by the Office of Air, Air Quality Division of the Texas Commission on Environmental Quality, is for informational purposes, and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For information concerning this map, contact the Air Quality Division at (512) 239-1459.

Made by: Kasey Savanich December 3, 2021

Source: Alison Stokes. TCEQ, 2022. "Air Quality Division Update".

<https://www.tceq.texas.gov/downloads/permitting/air/info/aqd-update.pptx>. Accessed 02/13/23

Designation and SIP Revision Cycle



Source: Alison Stokes. TCEQ, 2022. "Air Quality Division Update".

<https://www.tceq.texas.gov/downloads/permitting/air/info/aqd-update.pptx>. Accessed 02/13/23

Air Quality Monitors in the Alamo Region

