# TCEQ LogoNational Comments

# Executive Review Summary

# ****TCEQ Proposed Comments On:****

Docket ID No. EPA–HQ–OAR–2016–0751, 82 *Federal Register* 1733, January 6, 2017, Notice of Availability of the Environmental Protection Agency’s Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard

# ****Overview of Proposal:****

On January 6, 2017, the United States (U.S.) Environmental Protection Agency (EPA) published in the *Federal Register* a notice of availability of the EPA’s Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard (NAAQS). This information is used to develop state implementation plans (SIP).

# ****Summary of Comments:****

* The EPA should not include the Clean Power Plan (CPP) in the updated electric generating unit (EGU) projections.
* The EPA has not proven that a contribution by upwind states of 1% of the relevant NAAQS will “interfere with” maintenance in identified maintenance areas.
* The EPA does not provide a rationale for using the attainment deadline for moderate nonattainment areas as the projected analysis year.
* The TCEQ has updated nonpoint source oil and gas emissions estimates for drilling rig engines based on a study completed in 2015 and will provide this data to the EPA. The EPA should revise its 2017 and 2023 future-year inventories to incorporate these updates.
* In general for Texas EGUs, the EPA should use TCEQ-reported emissions rates for the 2011 base-year emissions inventory, and ensure future-year EGU emissions are reasonable based upon individual EGU characteristics and representative historic emissions data. Otherwise, the EPA risks over-predicting criteria pollutant formation by modeling unrealistically high emissions data.
* The TCEQ continues to support flexibility in the approach used by states when addressing interstate ozone transport.
* The EPA should not apply boundary conditions developed for 2011 for modeling a 2023 future year.
* 2011 is not representative of historical ozone formation for Texas and surrounding states because of the atypical meteorology (e.g., extreme temperatures) and related events (e.g., wildfires and exceptional drought).
* 2011 is not conducive to good model performance in Texas, and relatively poor model performance increases uncertainty surrounding estimates of contribution.
* The EPA should optimize meteorological parameters used for subsequent photochemical modeling.
* The EPA has not demonstrated the appropriateness of a 1% threshold to identify significant contribution to nonattainment and interference with maintenance.
* The EPA should appropriately differentiate action necessary for nonattainment and maintenance monitoring sites.
* The EPA should account for air quality trends when identifying maintenance areas.
* The EPA should use a consistent approach for assessing future attainment status and for calculating state contributions to future design values.
* The EPA should finalize the applicable modeling guidance.
* The EPA should evaluate and publish model performance for ozone and ozone precursors to demonstrate that the model is getting the “right answer for the right reason.”
* Upwind states should not be required to compensate for international emissions.

**Lead Office: Office of Air/Air Quality Division**

**Internal Coordination: Daphne McMurrer/OA/AQD/Air Quality Planning Section**

**Office of Legal Services: Terry Salem & Amy Browning/OLS/Environmental Law Division**

**Deputy Director Approval: Steve Hagle, P.E./Office of Air**

**EPA Deadline:** April 5**, 2017**