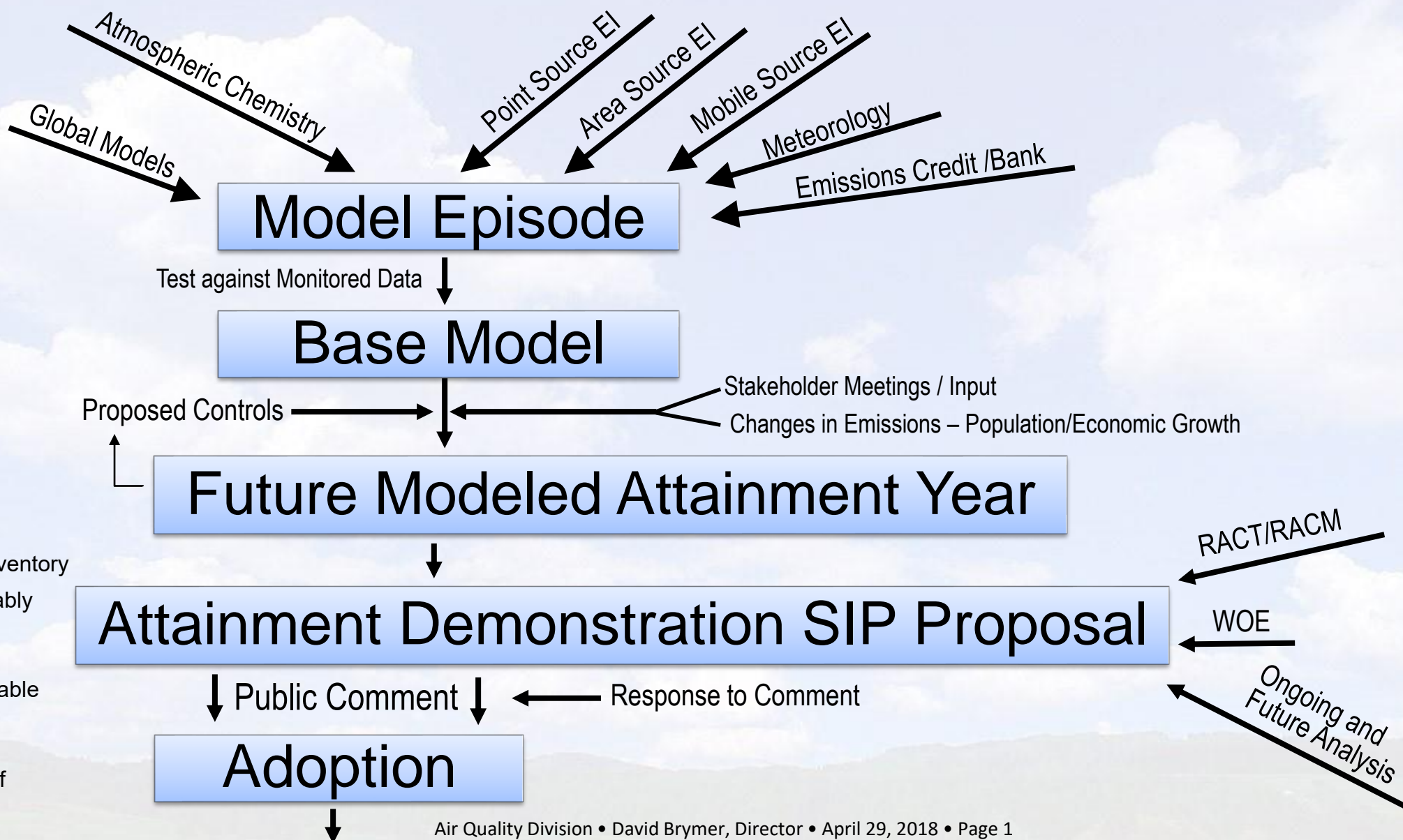




State Implementation Plan Process



6 – 24 Months

3 – 6 Months

Acronyms:
EI = emission inventory
RACT = reasonably available control technology
RACM = reasonable available control measures
WOE = weight of evidence



Texas Approaches to Ozone Controls Strategies in the Houston Area

- Stationary Sources (Market/Science and Technology Based)
 - TexAQS Field Studies – Highly Reactive Volatile Organic Compounds (HRVOC)
 - Optical imaging cameras – Tank Landings
 - Remote Sensing – Flares
 - Near real-time fenceline and HRVOC stack monitoring
 - Market based allocation and banking/trading programs (NOx sources; HRVOC)
- Mobile Sources (Financial Incentive Based)
 - Expanded banking and trading opportunities for mobile and area sources
 - Texas Emission Reduction Plan – targeting heavy duty (HD) diesel and alternative fuels



Ozone SIP Implementation Challenges in Texas

- Availability and price of additional emission reductions
 - Major source NO_x emission reductions exceed 80% in last 20 years
 - Emission reduction credit cost has gone from <\$5k to >\$150k in Houston in last 8 years
- Locally formed anthropogenic ozone can represent a small percentage of the total ground level ozone
 - 32% of Bexar County 2017 ozone design value (DV) from San Antonio area sources
- Population/Economic Growth
 - Mobile sources represent the majority of NO_x emissions in nonattainment areas
- Implementing Multiple National Ambient Air Quality Standards (NAAQS)
 - Spending a significant amount of resources over the next year addressing 1-hr and original 8-hr ozone NAAQS when those standards have been met for years or decades
 - A five year review cycle does not make sense if the timeframe to implement and attain a NAAQS is 8-20 years
- Public perception that air quality is degrading when the opposite is true