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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 23, 2017

Samuel Coleman, P.E.
Acting Regional Administrator
United States Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Updated State Designation Recommendations for the 2015 Ozone National Ambient Air Quality Standards (NAAQS)

Dear Administrator Coleman:

The United States Environmental Protection Agency (EPA) revised the primary and secondary eight-hour NAAQS for ozone to 0.070 parts per million, or 70 parts per billion (ppb), on October 1, 2015. Section 107(d) of the Federal Clean Air Act requires the governor of each state to submit to the EPA a list of all areas with a designation recommendation of attainment, nonattainment, or unclassifiable within one year of promulgation of a new or revised NAAQS. On September 30, 2016, the State of Texas submitted a designation recommendation to the EPA based on certified 2013 through 2015 data, the latest complete data available at the time that recommendations were due.

The EPA is expected to make designations by October 1, 2017, based on 2014 through 2016 monitoring data. The Texas Commission on Environmental Quality (TCEQ) is submitting this update to the September 2016 Texas recommendation considering the latest available, certified monitoring data for all areas in Texas from the 2014 through 2016 period. This takes into account the exceptional event demonstration related to El Paso currently pending before EPA. This is consistent with Texas' original designation recommendation that the recommendation be revised to attainment should any area in Texas monitor attainment based on 2016 data. Based on 2014 through 2016 monitoring data, Hood County is now attaining the 70 ppb standard with a design value of 69 ppb and should be designated as attainment. In addition, the TCEQ submitted an exceptional event demonstration for the El Paso UTEP (CAMS 12) monitoring site for a wildfire event that occurred on June 21, 2015, which supports an attainment designation for El Paso County.

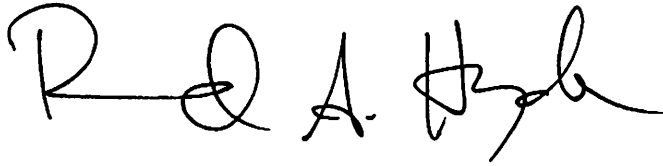
The TCEQ has also identified at least one additional exceptional event day that affected the El Paso UTEP monitor in 2016 that further supports an attainment designation for El Paso County. Submittal of additional exceptional event demonstration packages for 2016 is not necessary to demonstrate attainment should the EPA concur with the demonstration already submitted. However, should the EPA disapprove the 2015 exceptional event, then the TCEQ is prepared to notify the EPA consistent with 40 Code of Federal Regulations §50.14(c)(2) Treatment of Data Influenced by Exceptional Events, Initial Notification of Potential Exceptional Event that at least one additional exceptional event demonstration submittal will be developed to further demonstrate that El Paso County is in attainment of the 2015 ozone NAAQS based on the 2016 monitoring design value when exceptional events are taken into consideration.

Acting Regional Administrator Sam Coleman
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Accordingly, Hood and El Paso Counties should be designated attainment for the 2015 ozone NAAQS.

If you have any questions or need additional information, please feel free to contact me at 512-239-3900.

Sincerely,

A handwritten signature in black ink that reads "Richard A. Hyde". The signature is written in a cursive style with a large, stylized "R" and "H".

Richard A. Hyde, P.E., Executive Director
Texas Commission on Environmental Quality