



CITY OF DALLAS

DATE January 16, 2024

TO Office of Air, Texas Commission on Environmental Quality

SUBJECT **Public Comment to Request for Public Comments Regarding Proposed Dallas-Fort Worth Severe Area Attainment Demonstration State Implementation Plan Revision for 2008 Eight-Hour Ozone National Ambient Air Quality Standard**

January 16, 2024

Ms. Denine Calvin  
DFW SIP Project Manager  
State Implementation Plan Team – Office of Air  
Texas Commission on Environmental Quality  
PO Box 13087  
Austin, TX 78711-3087

RE: Dallas-Fort Worth Severe Area Attainment Demonstration SIP Revision for the 2008 Eight-Hour Ozone NAAQS Public Comments

Dear Ms. Calvin,

This letter drafted by the City of Dallas (COD), specifically the Office of Environmental Quality & Sustainability (OEQS), is in response to the Texas Commission on Environmental Quality's (TCEQ's) Attainment Demonstration SIP revision regarding the proposed Dallas-Fort Worth Severe Area Attainment Demonstration State Implementation Plan Revision for 2008 Eight-Hour Ozone National Ambient Air Quality Standard. Please find the COD's comments below;

#### **Photochemical Modeling Analysis**

- Request that TCEQ consider a more accurate modeling analysis than the photochemical analysis used by the TCEQ;
- Request the TCEQ to consider the impacts of COVID 19 pandemic on ozone trends by including years 2020, 2021, and 2022; and
- Make the analysis publicly available for review/public comment once complete.

#### **Reasonably Available Control Measures (RACM) analysis**

- Request the TCEQ to perform the RACM analysis of potentially reaching attainment by July 20, 2026, after the Photochemical and Weight of Evidence analysis has been completed; and
- Request the TCEQ to include both modeled future design values as well as observed and recorded data when performing future RACM analysis.

DATE January 16, 2024  
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### **Reasonably Available Control Technology (RACT) analysis**

- Request the TCEQ to confirm the existence of the negative declarations following the control technology guidelines for Wise County under the Volatile Organic Compound (VOC) RACT Determination. The TCEQ Regional offices should be able to provide assistance in determining if the proposed seven facilities are in operation and therefore should be removed from the VOC RACT Analysis.

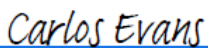
### **Contingency Plan**

- OEQS staff agrees with the proposed VOC emission revisions but requests the addition of industrial chemical blending operations to the list of six source categories, which includes: degreasing, industrial maintenance coatings, industrial cleaning solvents, emulsified asphalt paving, traffic marking coatings, and industrial adhesives.

### **Nonattainment NSR Program**

- OEQS staff agrees with the proposed revisions for the Nonattainment NSR Program to require permits for construction and operation of new or modified major stationary sources emitting at least 25 tons per year of a regulated pollutant.
- Request the TCEQ to also require minor source facilities to obtain a construction or operation permit for that emit at least 24.99 tons per year or less of a regulated pollutant.

Thank you for the opportunity to comment on TCEQ's proposed revisions to the SIP. Should you have any questions, please call Mr. Joseph Vu at 214.670.4059.

  
Carlos Evans (Jan 16, 2024 14:03 CST)

Carlos Evans  
Director, Office of Environmental Quality & Sustainability