ASH GROVE

A CRH COMPANY

STRONG FOUNDATIONS. STRONG FUTURE.

June 18, 2025

Submitted electronically at https://tceq.commentinput.com/

Office of Legal Services
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78711-3087

Re: Section 185 Fee for the 2008 Ozone NAAQS - RPN 2023-131-101-AI

Background

Ash Grove Cement Company, a CRH Company, is a leader in the cement industry in the United States. As one of the largest cement producers in North America, we have provided cementitious materials for over 142 years to build the highways, bridges, commercial and industrial complexes, and homes that support our nation's infrastructure. We operate 12 cement manufacturing facilities and a network of 41 cement distribution terminals across the United States, ensuring a reliable supply of high-quality materials.

Ash Grove owns and operates one of its cement manufacturing facilities in Midlothian, Ellis County, Texas. Ash Grove's facility began operations in Ellis County in 1966 and in the early 1970s, it received the first air permit of its kind issued by the then Texas Air Control Board. To this day, the facility's construction and operational requirements continue to be found in the updated and expanded Permit Number 1. In 2012, Permit No. 1 was amended to authorize the start of the most significant modernization in the facility's history. By 2014, Ash Grove had invested over $120 million to modernize the heart of the cement-making process at the facility – the cement kiln. Since 2014, the facility's modernized kiln process started to make cement with lower emissions than ever before.

The cement produced at the Midlothian facility fuels the growth in the DFW area. It is used as the binder that allows sand, stone, and other aggregates in concrete to serve as the foundation of homes, the columns of buildings and bridges, and other infrastructure underpinning the development of the state of Texas. In the early 2000s, Texas consumed about 11.5 million tons of cement, second only to California's cement consumption. Today, Texas is the highest consumer of cement in the United States; higher than #2 California and #3 Florida,

DIRECT 972-723-7277
FAX 972-534-1231

marco.gonzalez@ashgrove.com

900 GIFCO RD / P.O. BOX 520
MIDLOTHIAN, TX 76065

ASHGROVE.COM

combined. Manufacturing at the Midlothian site employs 127 full-time employees, generates over $3.4 million dollars in various taxes, and helps support thousands of local jobs and businesses.

Despite the overall reductions in ozone forming emissions from most categories of sources in the DFW non-attainment area since the year 2006, if by the year 2027, the area does not reach attainment, the requirements in this rule project will apply as long as the DFW area retains that classification. Since the Ash Grove facility is in the DFW ozone non-attainment area, it is potentially subject to this rule-making project and the Section 185 fee. We respectfully submit the following comments for consideration by the TCEQ.

Comment 1: The rule proposes new fees for all existing major sources of VOC and NOx in the DFW and HGB non-attainment areas, regardless of a particular source's history of emission reductions, if those reductions occurred before a ten or five year window. The TCEQ should consider alternatives to credit facility operators who reduced emissions earlier than required in the State Implementation Plan.

Section 101.705(b)(2) states that affected sources must establish a baseline emission level for fee calculation purposes. As proposed, the baseline year selected to establish the emission level may be set during a historical period of ten years for non-electric utility steam generating units or five years for electrical utility steam generating units.

As currently proposed in these rules, Ash Grove would not be able to include emissions older than ten years to establish its baseline. That means that the substantial emission reductions Ash Grove achieved after 2014 would not count (i.e., the reductions occurred more than 10 years prior to the presumed effective date of this rule). It is worth noting that Ash Grove was following all applicable emission limits established as part of the DFW State Implementation Plan prior to the 2014 modernization. At the risk of taking a historical detour too far back in time, before Ash Grove's 2014 modernization, Ash Grove had already installed NOx reduction technologies like mid-kiln injection of fuels (around 1996) and selective non-catalytic reduction (around 2007), achieving substantial NOx emission decreases in the process. The modernization efforts at Ash Grove completed in 2014 were not required by the SIP.

Under the proposed rule, if Ash Grove's 2014 modernization had occurred only a few years later than it did, pre-modernization emissions would have been more recent and eligible to qualify as the facility baseline. As currently proposed, the baseline would be established after Ash Grove's modernization, which resulted in a reduction in ozone-forming emissions from the facility of between 70% and 80%. Had Ash Grove waited a few years longer to modernize the facility, it may be possible that it would have received recognition for its reductions and not be subject annually to Section 185 fees.

Ash Grove's case in regard to NOx emission reductions may not be unique if one examines each point source in the DFW area, but it is only one that we are most familiar with, so it is one we would like to emphasize from another perspective. In April of 2024, the TCEQ adopted the DFW Severe Area Attainment Demonstration State Implementation Plan Revision for the 2008 Eight-Hour Ozone Standard. As part of the photochemical modeling conducted in support of this demonstration, TCEQ estimated the highest permit- or rule-limited emissions from the Ellis County cement kilns in the 2026 Future Case. The TCEQ conservatively assumed that in the worst case, all the cement kilns in Ellis County (operated by three different cement companies including Ash Grove's) would emit in the aggregate 15.12 tons per day of NOx.

Although it is a safe assumption to make for photochemical modeling (i.e., to use the maximum NOx value allowed by rule or permit as modeling inputs), this Section 185 rule-project as presented would not allow Ash Grove to use the baseline NOx emissions level that TCEQ relied on for its conservative maximum emissions assumption in its photochemical modeling. Ash Grove estimates that its share of the 15.12 tons of NOx per day used in the model was 4.41 tons per day, which was set prior to its 2014 modernization. Meaning that, in practical terms, Ash Grove's emissions are modeled using the equipment it operated prior to the modernization, but for fee purposes of this rulemaking, Ash Grove is not allowed to use the actual emissions from the same older-technology kilns to set its Section 185 fee baseline (i.e., pre-modernization).

Therefore, as an alternative, we are proposing the following: consider letting point sources define the baseline as the highest annualized average emissions since 2008 (i.e., the year of the standard for which DFW is now classified as severe). For Ash Grove specifically, this could result in an average emission rate of around 3.78 tons of NOx per day for the baseline which is still lower than what Ash Grove understands was used in the worst-case scenario for Ash Grove in last year's photochemical modeling demonstration. In other words, the modeling assumption TCEQ made in 2024 for the future 2026 emission rate for Ash Grove would remain conservative while giving Ash Grove (and presumably other sources) credit for significant NOx emission reductions achieved since the promulgation of the 2008 NAAQs Ozone standard.

Ash Grove, as a member of a class of sources known as point sources, may not be unique in the reductions it achieved since 2008. According to data presented by the NCTCOG, point sources in the DFW area reduced NOx emissions from about 58 tons per day in 2006 to 34 tons per day, projected by 2026. In the aggregate, this category of sources reduced NOx emissions by about 40%, conservatively. It should be reasonable to allow sites that operated in 2008, and that are still in operation at the time this rule takes effect, to set a baseline based on actual emissions since the promulgation of the 2008 standard.

Comment 2: The Section 185 fees are a mandated imposition of a fee on a category of sources; it does not necessarily follow that ozone precursor emissions will automatically decrease because of the fees, given the expected increases in NOx emissions resulting from population growth, unless there are other programs for reducing emissions at other categories of sources (i.e., mobile sources). TCEQ has such programs in the form of TERP.

Whether or not major sources of NOx and VOC emissions in the affected areas reduce emissions of these ozone precursors, and by how much, after the proposed rule is implemented is a site-specific and complex question to try to answer. In the most optimistic of cases, if all point sources reduce their future emissions by an amount that zeroes their maximum Section 185 fee (i.e., if each affected site emits less than 80% of their baseline emissions year after year because of this rule) one thing is for sure: it will increase costs at each site. It is unlikely that, even with these optimistic reductions at point sources, it will bring the DFW area to attainment since point sources in DFW now represent less than 20% of the NOx that goes on to form ground-level ozone.

As presented by the North Central Texas Council of Governments on June 10, 2025 during a Section 185 stakeholder meeting, operators of point sources subject to the Section 185 fees in the DFW area will account for about 18% of the future 2026 NOx emissions. Assuming the ideal and optimistic case that their emissions were to decrease enough to reduce their Section 185 fee to zero, it would optimistically reduce their NOx contribution by a few tons per day (i.e., by about 6.8 tons per day).

Meanwhile, in the same presentation, NCTCOG presented the projections for area source NOx emissions by 2026. This area source category has become a very significant and growing source of NOx emissions in the last two decades. In 2006, point source NOx emissions in DFW were substantially higher than those of area sources. Since then, area source NOx emissions in the DFW area have overtaken point source emissions. Whereas point sources as a category in DFW **reduced** their emissions by 42% from a 2006 baseline to a 2026 future estimate, area sources as a category are expected to **increase** their emissions by 22.4% over the same period. Indeed, according to data from NCTCOG, five of all six category types of emission sources of NOx in the DFW area will decrease their NOx emissions since 2006, except for the category of area sources. And the increase in NOx emissions in area sources during this period almost zeroes out the most optimistic case of reductions by point sources, as a category, if point sources reduce their Section 185 fee to zero (i.e., area source NOx emissions are projected to increase by 6.3 tons per day).

This should not surprise anyone who pays attention to the projections from NCTCOG regarding population: they project that population in the DFW area will increase by 63% from 2019 to 2050. If recent history is an indication, this future population growth is likely to increase the amount of NOx emitted by area sources after 2026 by a larger margin than the

optimistic scenario resulting from the implementation of Section 185 fees since area source emissions tend to increase with increases in population.

For these reasons, additional means of reducing ozone-precursor emissions are needed to address the expected population growth and increases in vehicle miles traveled in the DFW area. Ash Grove understands that the proposed rules would set up a mechanism for the DFW and HGB Section 185 fee obligation to be partially satisfied with credits equal to the grant revenue spent on projects that reduce air emissions as part of the Texas Emission Reduction Program.

Ash Grove understands that since TERP is funded by vehicle title fees and taxes associated with on-road, off-road, and commercial vehicles use, and since these types of sources are a significant contributor of NOx in the DFW area (on-road and non-road mobile are 45% of the projected 2026 emissions), any future TERP grants that contribute to emissions reductions from that sector should also serve as a credit to partially satisfy the Section 185 fee obligation for that year. Since the Section 185 fees that Texas will collect annually under this rule will be channeled to the Texas Clean Air Fund that is administered by the TCEQ to safeguard the air resources of the state of Texas, both TERP grants funds and the collected Section 185 fees under the draft rules will be used to improve air quality in the state. Ash Grove understands that the proposed rule would not result in increases to TERP fees already levied, and that any credits applied towards each area's 185 fee obligation would only be equal to TERP grants for reducing emissions in those non-attainment areas. With that understanding, Ash Grove supports this aspect of the rule since mobile sources account for a significant portion of the DFW 2026 emission inventory.

Thank you for the opportunity to comment on these draft rules.

Sincerely,

Marco Gonzalez
Plant Manager

Attachment: Presentation from the NCTCOG June 10, 2025 Stakeholder's Meeting

Dallas-Fort Worth Air Quality Improvement Plan Meeting on Section 185 Fees

North Central Texas Council of Governments

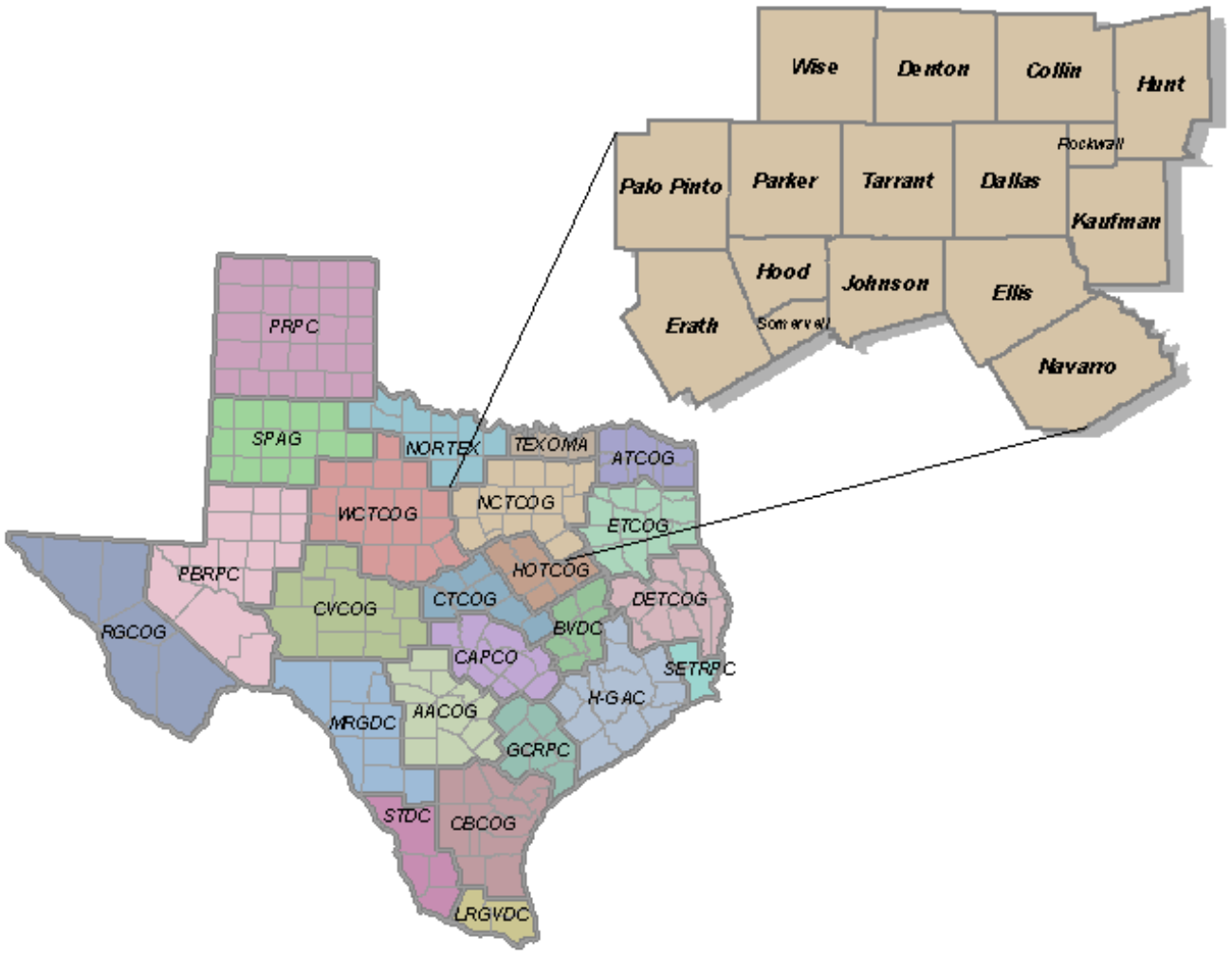
June 10, 2025

Agenda

June 10, 2025

Introduction and Why **– Savana Nance, NCTCOG**	**2:00 – 2:10pm**
Current Air Quality Status and "Failure to Attain Fee" **– Chris Klaus, NCTCOG**	**2:10 – 2:40pm**
Break	**2:40 – 2:45pm**
Climate Pollution Reduction Grants in Texas **– Savana Nance on behalf of Kasey Savanich,** **Texas Commission on Environmental Quality**	**2:45 – 2:50pm**
Funding Opportunities **– Lori Clark, NCTCOG**	**2:50 – 3:00pm**
Dallas-Fort Worth Air Quality Improvement Plan **– Savana Nance, NCTCOG**	**3:00 – 3:20pm**
Open Discussion	**3:20 – 3:30pm**

Who We Are



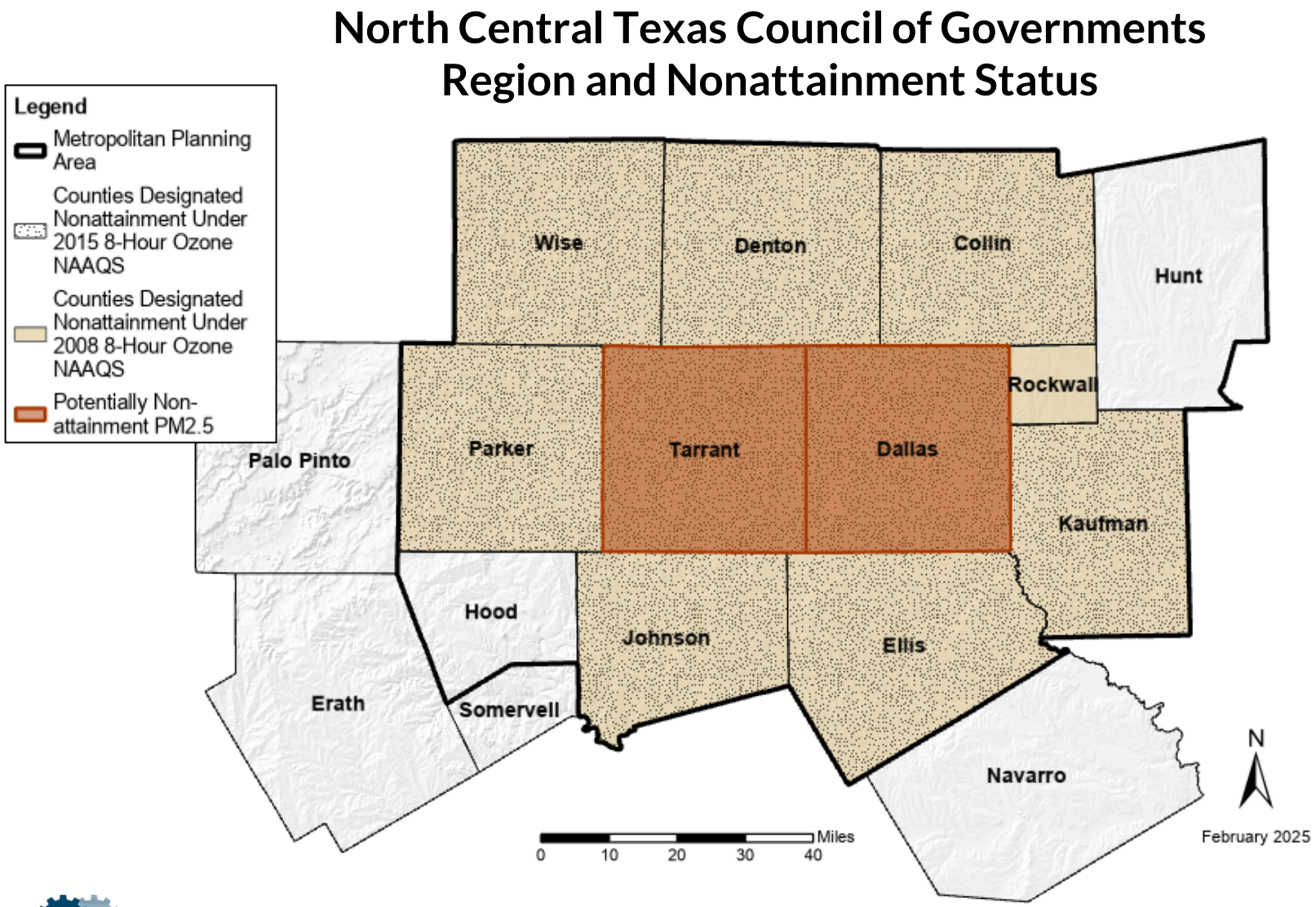
North Central Texas Council of Governments

Regional Planning Agency

Regional Transportation Council

Metropolitan Planning Organization (MPO)

Why: Local Air Pollution



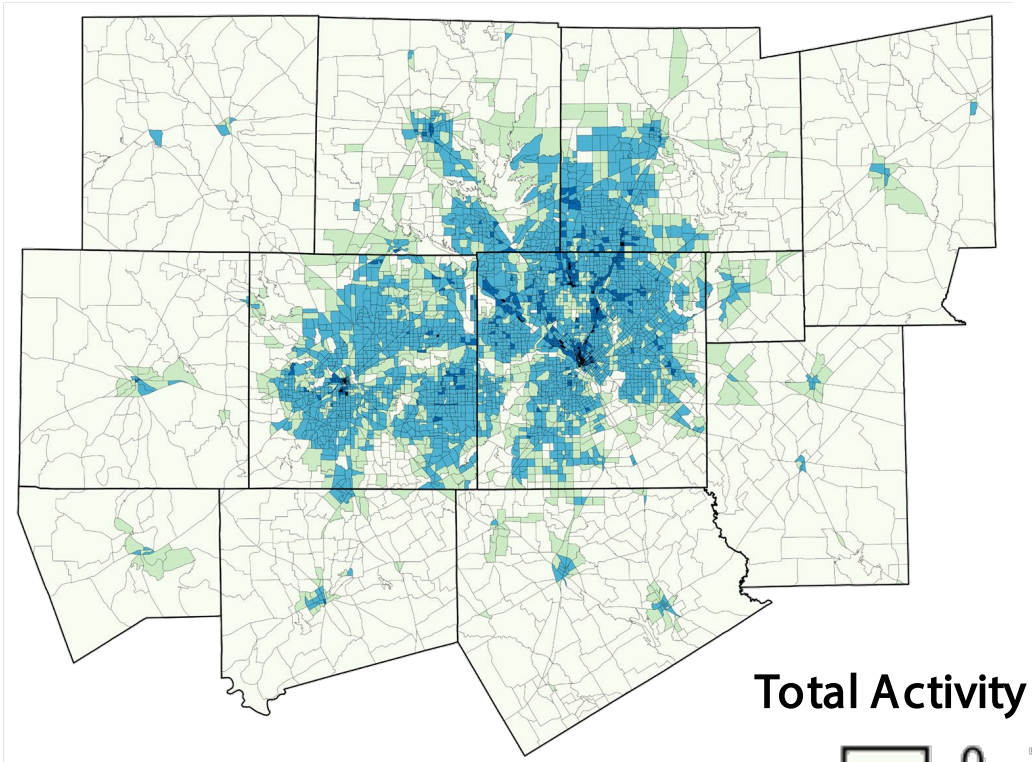
Source: NCTCOG

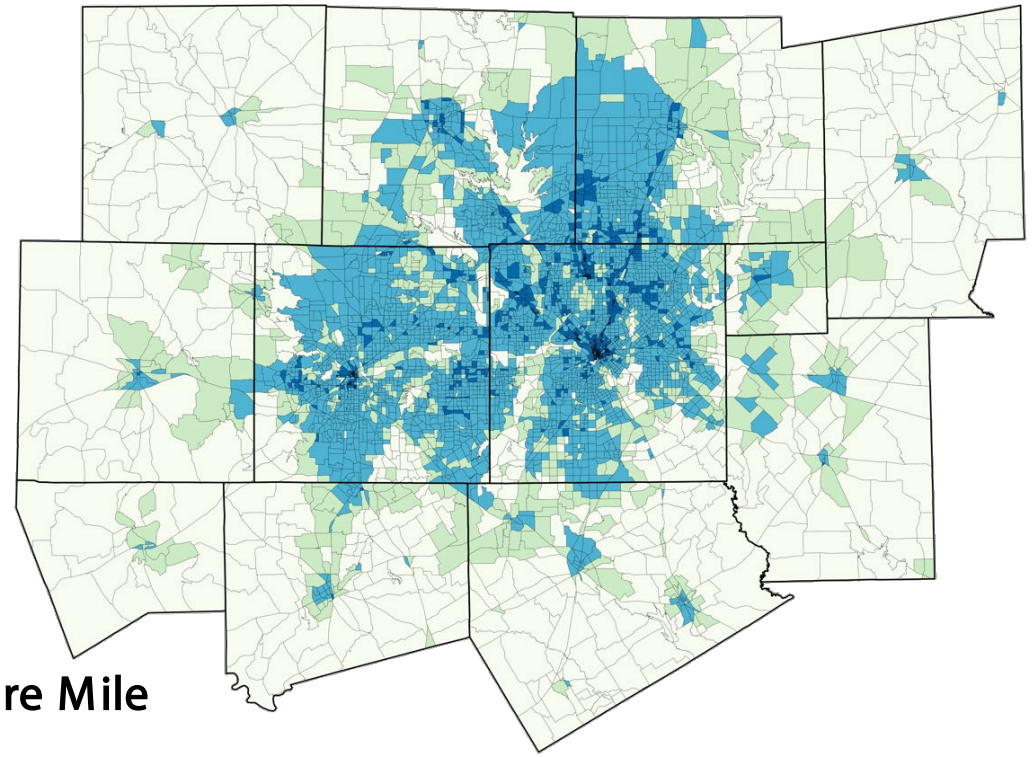
Impacts of Criteria Air Pollutants

- Irregular heartbeat
- Respiratory symptoms
- Premature death
- Environmental impacts
- Economic impacts

Source: www.epa.gov/criteria-air-pollutants

Why: Growing Population





Total Activity Per Square Mile

- 0 - 1,152
- 1,152 - 4,116
- 4,116 - 19,244
- 19,244 - 76,000
- 76,000+

2019 Estimates
Population: 7,528,004

Vehicle Miles Traveled (miles/day): 208,590,323

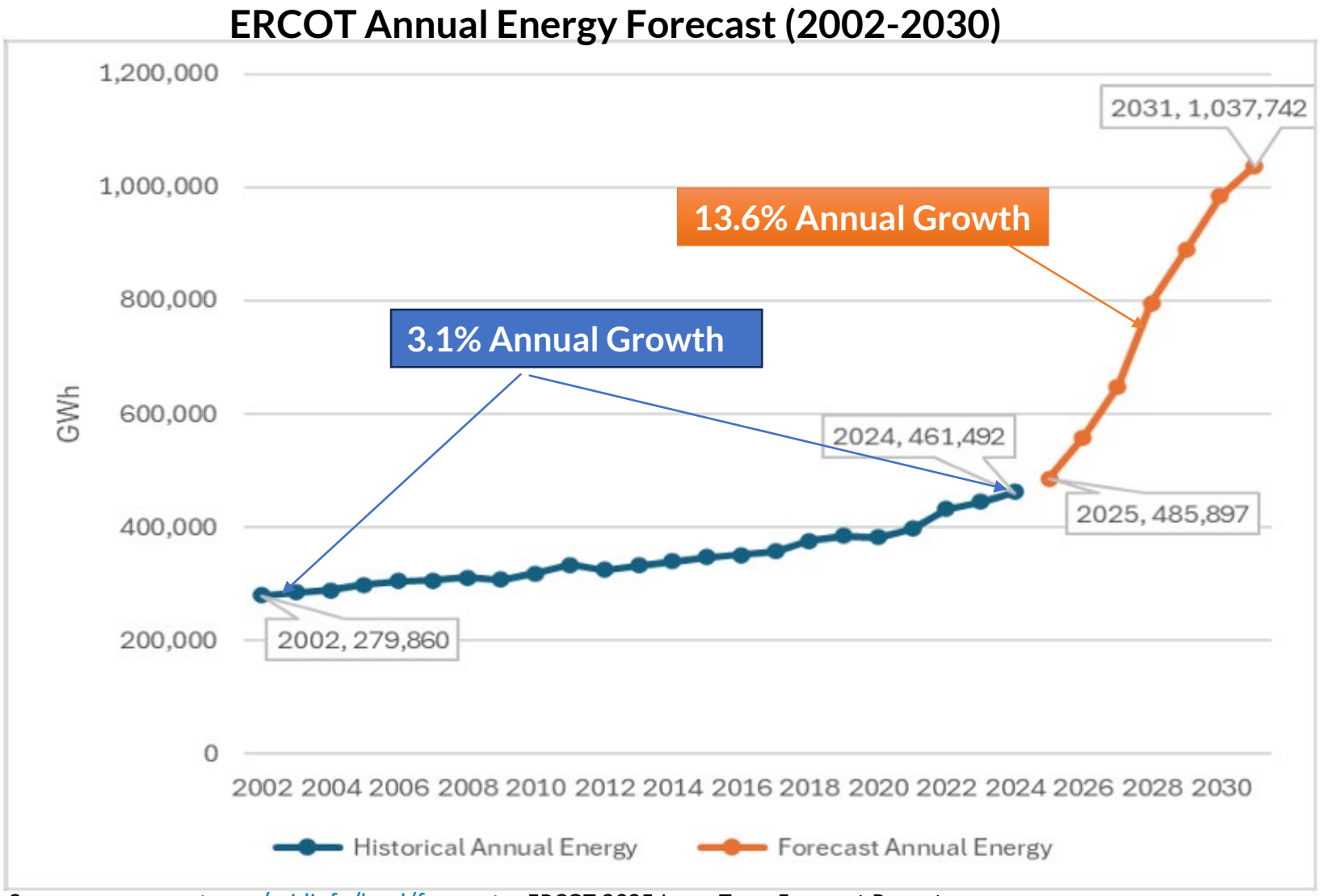
2050 Estimates
Population: 12,297,156

Vehicle Miles Traveled (miles/day): 377,176,365

***Population and Vehicle Miles Traveled Estimates are Draft**

Source: www.nctcog.org/executive-director/nctcog-executive-board – November 2024 Item 15

Why: Future Electricity Demand



Source: www.ercot.com/gridinfo/load/forecast ->ERCOT 2025 Long-Term Forecast Report

Largest contributors to demand increase (Large Load)

Cryptocurrency mining

Data centers – AI usage contributing factor

Oil and Gas – exploration and recovery operations

Hydrogen production

Large industrial

1 Gigawatt Hour (GWh) could power: ~ 1.1 million homes for an hour; 1 electric car for 3 million miles

Poll- Mentimeter

1. Who are you representing?
   - *Self, Industry, Other Commercial Company, Nonprofit, Local government, Special district, Other*
2. What counties do you primarily work in?
   - *Collin, Dallas, Denton, Ellis, Erath, Hood, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, Parker, Rockwall, Somervell, Tarrant, Wise, None of the above.*
3. What county do you live in?
   - *Collin, Dallas, Denton, Ellis, Erath, Hood, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, Parker, Rockwall, Somervell, Tarrant, Wise, None of the above.*
4. Which of the following concerns you regarding local air quality?
   1. *Economic development (job opportunities, new facilities, etc.)*
   2. *Fees*
   3. *Negative health impacts*
   4. *Severe weather events*
   5. *Rising energy costs*
   6. *Other*

https://www.menti.com/alezrpn5n5hd

Poll- Mentimeter

How familiar are you with local air quality issues?

- *Very familiar*
- *Somewhat familiar*
- *Not at all familiar*

Which air quality issue are you most familiar with?

- *Ground-level ozone*
- *Particulate matter*
- *Carbon emissions*
- *Other*

Do you have any major emission reduction projects planned between now and 2050 which will improve air quality?

- *Yes*
- *No*
- *Unsure*

https://www.menti.com/alezrpn5n5hd

Current Air Quality Status and "Failure to Attain Fee"

Emission Monitoring

National Ambient Air Quality Standards (Criteria Pollutants)

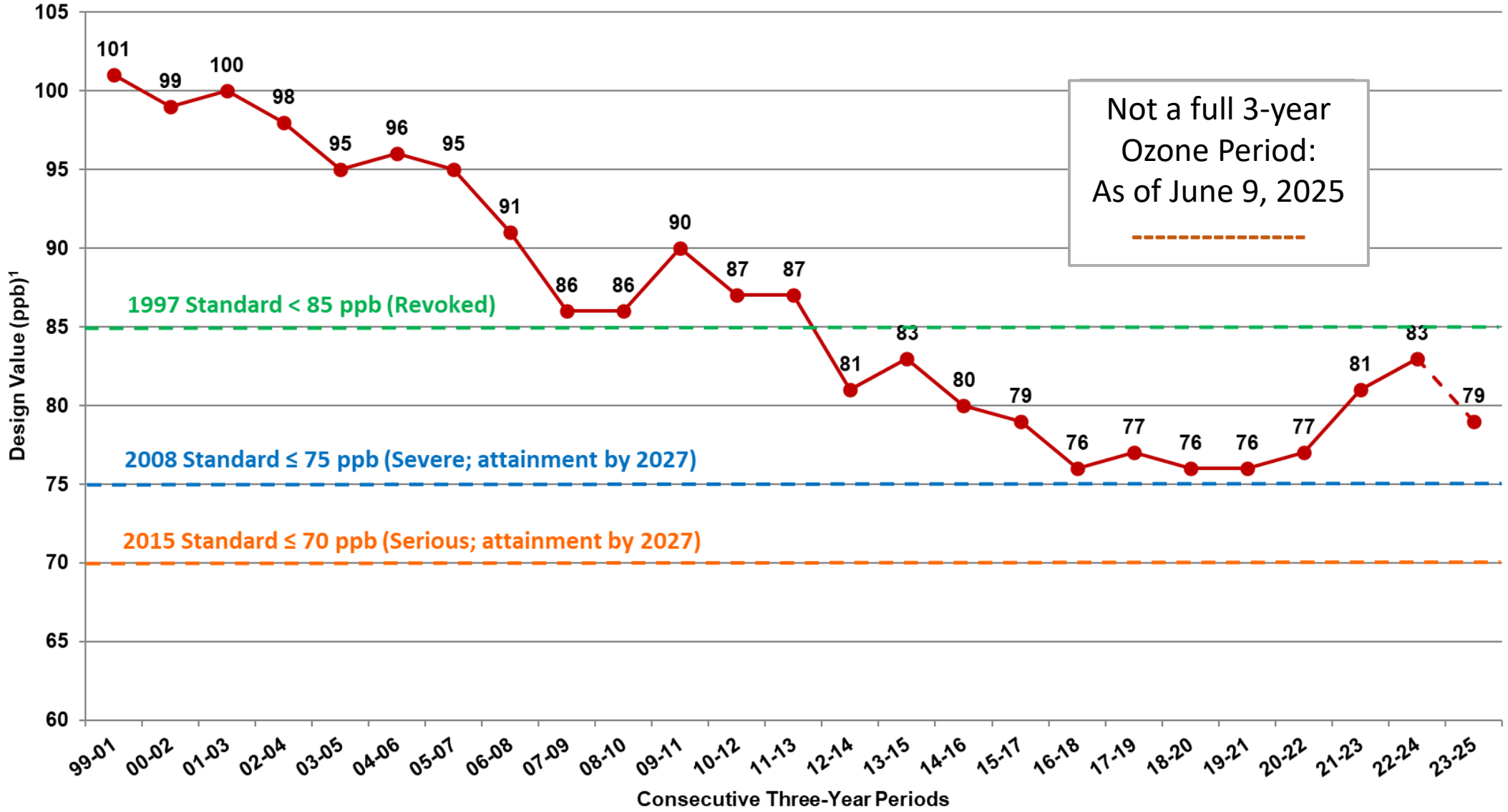
	Attainment	Nonattainment
Ozone		✗
Lead	✓	
Carbon Monoxide	✓	
Nitrogen Dioxide	✓	
Particulate Matter	✓	
Sulfur Dioxide		

Partial Nonattainment In
Navarro County
Due to Aggregate Plant

Monitoring

Atmospheric Gases (i.e., Carbon Dioxide)

8-hour Ozone NAAQS Historical Trends

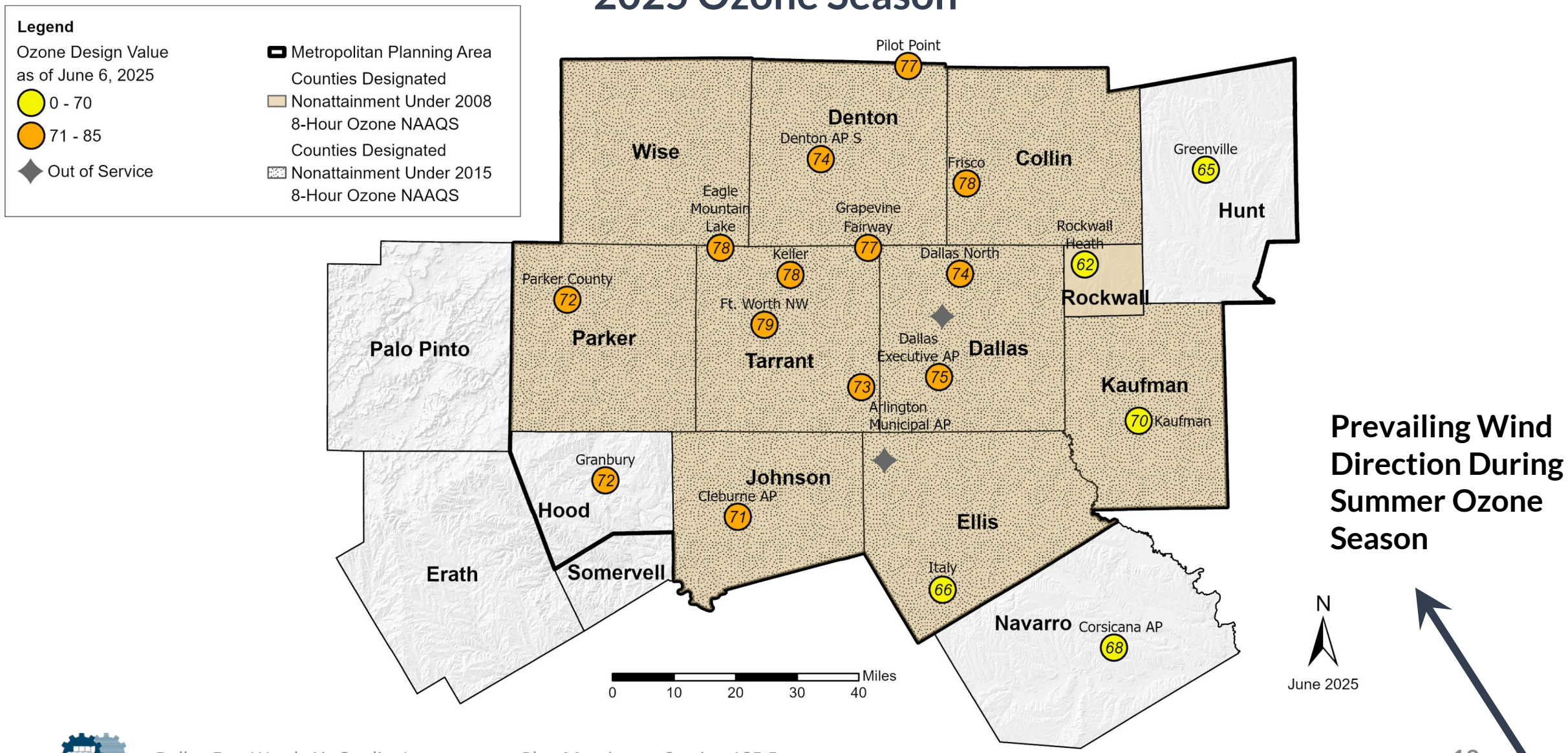


[1]Attainment Goal - According to the US EPA National Ambient Air Quality Standards, attainment is reached when, at each monitor, the *Design Value* (three-year average of the annual fourth-highest daily maximum eight-hour average ozone concentration) is equal to or less than 70 parts per billion (ppb).

Source: TCEQ

Monitor Locations with Current Design Values

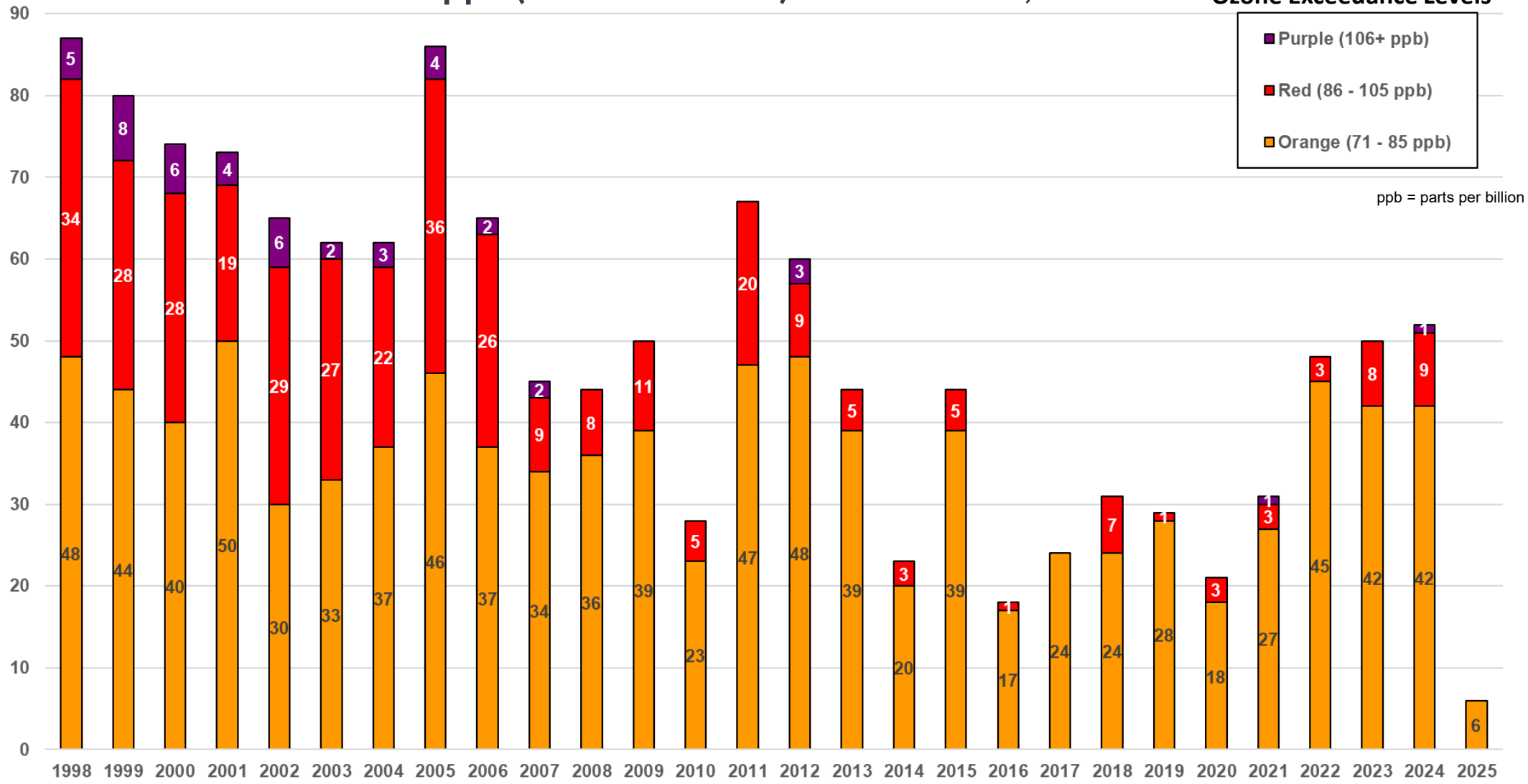
2025 Ozone Season



Prevailing Wind Direction During Summer Ozone Season

8-hour Ozone NAAQS – Exceedance Trends

Based on ≤ 75 ppb (2015 Standard) – as of June 9, 2025

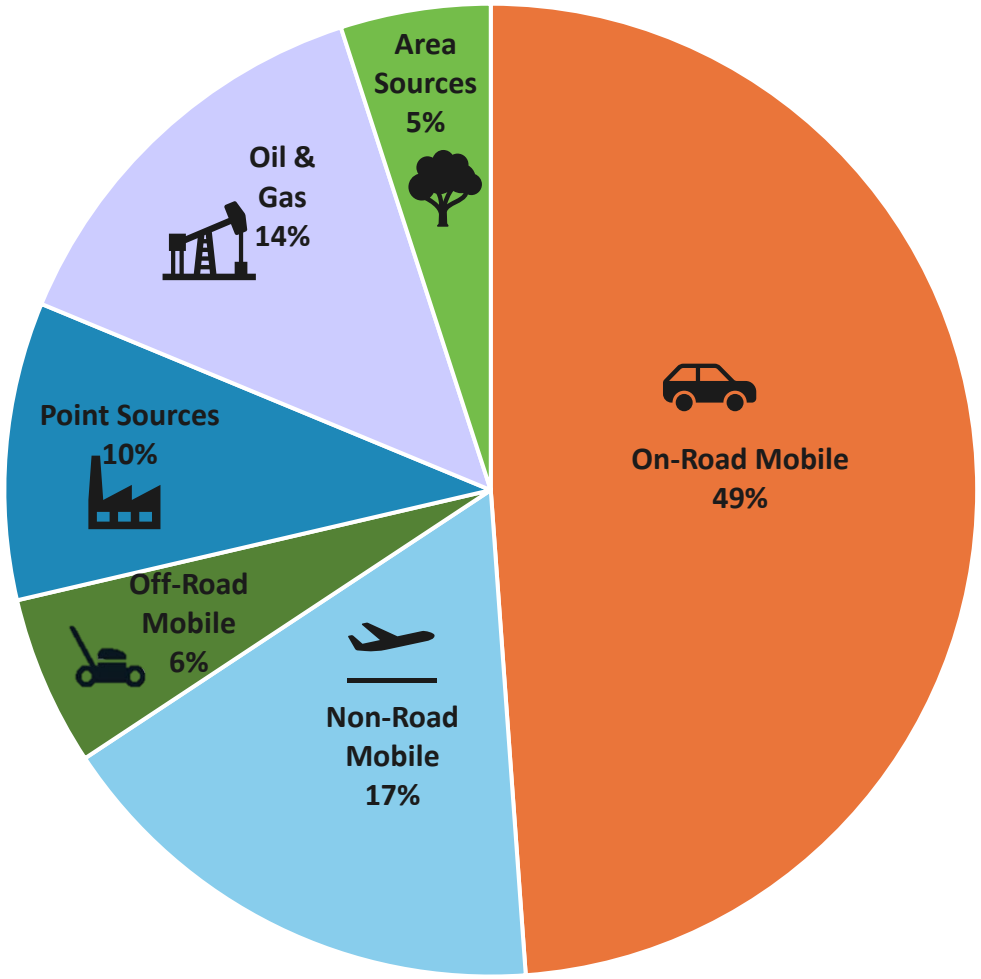


Exceedance Level indicates daily maximum eight-hour average ozone concentration.
Exceedance Levels are based on Air Quality Index (AQI) thresholds established by the EPA for the for the revised ozone standard of 70 ppb.

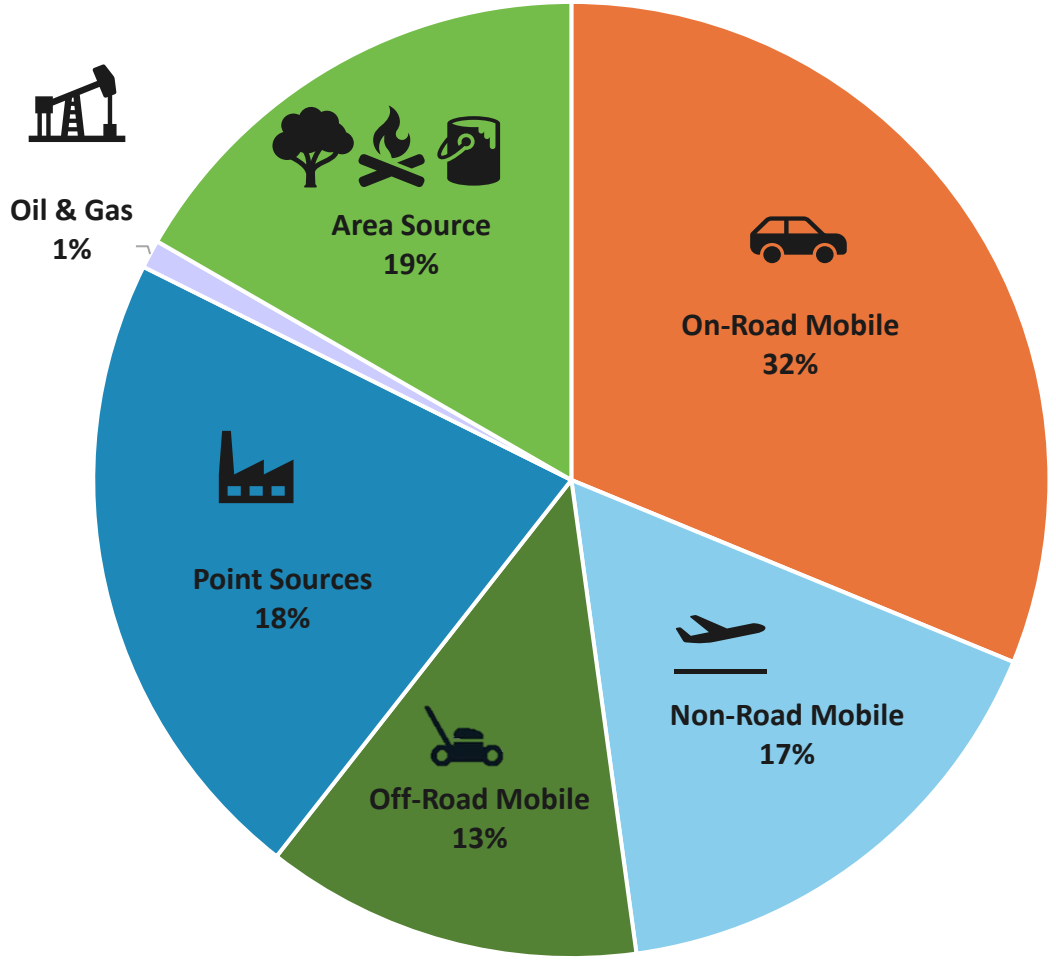
Source: TCEQ http://www.tceq.state.tx.us/cgi-bin/compliance/monops/8hr_monthly.pl

NO_x Emissions Apportionment*

2006 Inventory of Nitrogen Oxides (NO_x) – 581.9 t/d



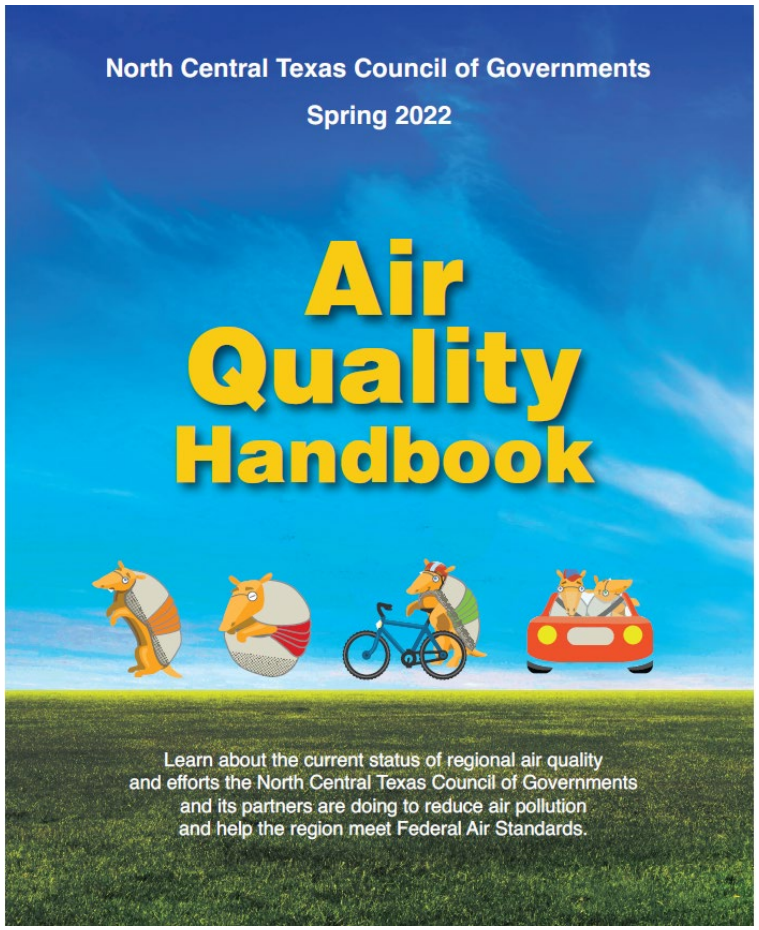
2026 Inventory of Nitrogen Oxides (NO_x) – 187.5 t/d



*Our region has less NOx than VOC, making it NOx limited.

Air Quality Handbook

English



https://nctcog.org/nctcg/media/Transportation/DocsMaps/Quality/Air/AQ2022printer_Spring.pdf

Spanish

https://www.nctcog.org/nctcg/media/Transportation/DocsMaps/Quality/Air/AQ2022SPANISH.pdf

Vietnamese

https://www.nctcog.org/getmedia/787b9fe9-94d9-4d76-9701-020876a06e61/AQHbkViet.pdf

Major Source Fees for Failure to Attain

"Section 185" Fee Program For Major Stationary Sources Of NO_X And VOC
Clean Air Act Requirement Due To Reclassification From "Serious" To "Severe"
Attainment Required By End Of 2026 To Meet Severe Attainment Date
Design Value Based On 2024-2026 Regional Monitor Data

If Unable To Reach Attainment
Per Ton Penalty Fee As Soon As 2028
Fees Collected Annually Until Attainment Of 2008 Ozone Standard
Implemented By TCEQ
Sources Such As Power Plants, Refineries, Cement Plants, etc.
Anticipated Fee For DFW ~ $45 Million

Source: TCEQ (https://www.tceq.texas.gov/airquality/airmod/meetings/aqtim-dfw.html)

TCEQ Proposed Rule for Failure to Attain Fee

Would credit grant revenue from the Texas Emission Reduction Plan (TERP)

To offset fee

If amount of grant revenue is < the total penalty fee for the area, large industries would pay remainder of the penalty fee owed

If TCEQ does not implement a program to collect the fee:

EPA will collect the fee with interest, and not be returned to the state

Public Comment Opened: May 6, 2025

Public Hearing: June 12, 2025

Public Comment Closes: June 18, 2025

Develop and submit rules: November 2025

https://www.tceq.texas.gov/airquality/point-source-ei/185-fee

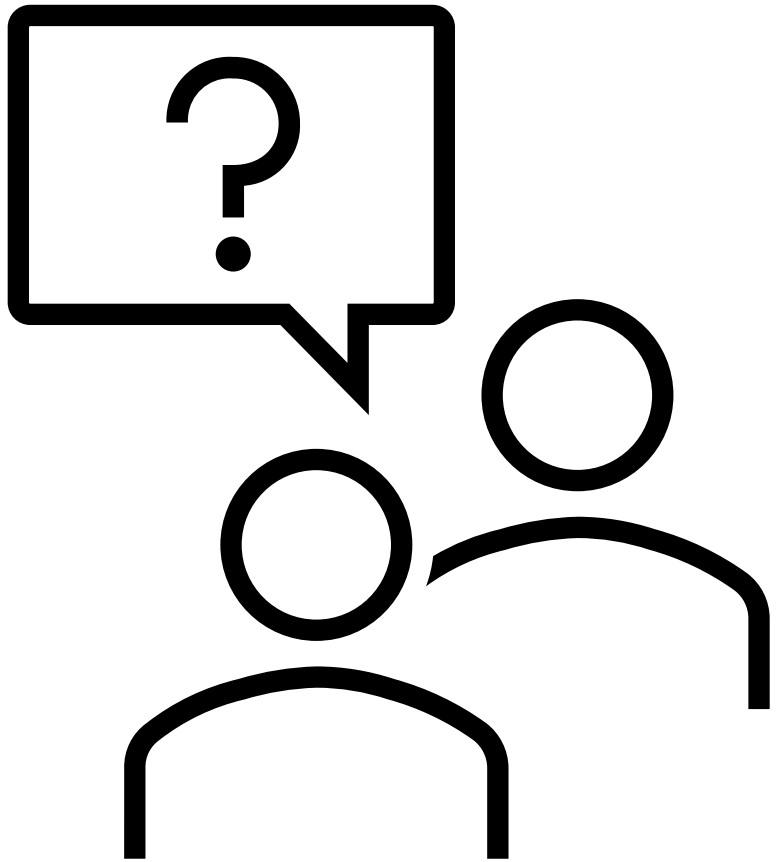
2022 Major Point Sources

DFW 10-County Nonattainment Area Major Point Sources: Nitrogen Oxides (NOx)*						
County	Number of Major Point Source Facilities				Emission Totals (tpy)	Total Percent of 10-County Major Source Point Emissions
	Cement, Hydraulic (Kilns)	Electric Services (EGUs)	Petroleum & Natural Gas	Other (91 Source Types)		
Collin	-	1	0	12	86	0.8%
Dallas	-	2	0	68	1,053	9.3%
Denton	-	2	13	13	283	2.5%
Ellis	3	2	1	21	4,773	42.2%
Johnson	-	1	18	15	1,253	11.1%
Kaufman	-	1	0	5	1,212	10.7%
Parker	-	-	7	18	278	2.5%
Rockwall	-	-	0	3	13	0.1%
Tarrant	-	1	16	51	783	6.9%
Wise	-	1	53	7	1,589	14.0%
Total	**3**	**11**	**108**	**213**	**11,321**	**100.0%**

Source: TCEQ - 2022 point source data extracted from the State of Texas Air Reporting System (STARS) on November 30, 2023.
*Data maybe subject to revisions and corrections and is a snapshot of the data extracted on the date specified.

Source: State of Texas Air Reporting System (STARS) - https://www.tceq.texas.gov/airquality/point-source-ei

Q & A



Climate Pollution Reduction Grants (CPRG) Program in Texas

Kasey Savanich

CPRG Planning Grants in Texas

- Three main deliverables over the 4-year program running through July 31, 2027:
  - Priority Action Plan (PAP) – Submitted to EPA on March 1
    - Available on TCEQ's CPRG website
    - All other area plans (including TCEQ's) available on EPA's website
  - **Comprehensive Action Plan (CAP) – Due to EPA December 1, 2025**
  - Status Report – Due to EPA July 2027
- Texas is creating a Comprehensive Roadmap to Reduce Emissions as its CAP.
  - Focus on voluntary actions to reduce pollution that is harmful to human health.
  - Emissions reductions will have a co-benefit of reducing GHGs.

Voluntary Actions to Reduce Emissions

- Industry: electrification; low emission alternate fuels such as hydrogen; energy efficiency; carbon capture, utilization, or storage; ultra-low global warming potential (GWP) refrigeration.
- Oil and Gas: replace pneumatic controllers, motors, and pumps; remove redundant equipment; add monitoring to reduce fugitive emissions; reduce flaring and capture methane emissions; remediate and/or plug low producing and abandoned wells.
- Transportation: low or zero emissions light- medium- and heavy-duty trucks, support equipment, busses, or locomotives; infrastructure for electric vehicle charging and hydrogen fueling stations; replace fleets with zero emission vehicles; low or zero emission fuels.
- Electric Generation or Use: upgrade transmission lines; advanced nuclear energy; geothermal energy; grid scale renewable energy storage; load management, load shifting, and energy efficiency to lower demand; carbon capture, use, and storage.
- Other Sectors: biofuels; capture methane from landfills and wastewater treatment plants; electric heat pumps; rooftop solar, energy efficiency, or weatherization for commercial and residential buildings; increase recycling, reduce waste, increase composting, and add recycling infrastructure; sustainable agriculture or forestry practices; coastal landscape restoration; reforestation; efficient pumps and irrigation systems in agriculture; increase urban tree canopy.

Available Funding/Technical Assistance*

- EPA list of remaining federal opportunities.
- Energy efficiency assessments and implementation grants for small to medium industries through Industrial Training Assessment Centers (ITAC).
- Technical assistance for large industrial facilities to identify and implement energy objectives through Onsite Energy Technical Assistance Partnerships (TAPS).
- Upgrades for vehicles, equipment, and new technology through the Texas Emissions Reduction Plan (TERP).
- Grants to plug low-producing conventional oil and gas wells through the Texas Voluntary Marginal Conventional Well Plugging Program (TxMCW).
- Technical support for energy efficiency for any size U.S. based manufacturing company or industrial-scale energy-using organization through The U.S. Department of Energy's (DOE) Better Plants Program.

*List is not inclusive of all available funding or technical assistance and is subject to change. Contact cprg@tceq.texas.gov if you have questions about funding for your specific project.

Questions?

Contact:
Kasey Savanich
cprg@tceq.texas.gov

Sign up for updates:
https://www.tceq.texas.gov/agency/climate-pollution-reduction-grants

Send in your Input:
cprg@tceq.texas.gov

Air Quality Funding

NCTCOG Property Assessed Clean Energy Act (PACE) Program

- The PACE program was established by the Texas Legislature in 2013 under **Chapter 399 of the Local Government Code**
- Allows local governments to work with property owners and private sector lenders to **finance energy efficiency and water conservation-related projects**
- PACE provides low-cost, long-term loans to **commercial, industrial and multi-family** property owners to **finance energy efficiency and water conservation projects**
- Property Owners may be eligible for up to **100% financing for eligible improvements, based on voluntary assessment**
- On May 22, 2025, the NCTCOG Executive Board approved contracts to support expansion of **C-PACE throughout 16-County NCTCOG Region***
- NCTCOG Procurement Committee selected two PACE Vendors to provide PACE Administration services:
  - **Lone Star PACE & Texas PACE**
- **Stay Tuned!**

* *Part of work effort under a Texas State Energy Conservation Office (SECO) Grant to the NCTCOG.*

Federal Tax Credits

Inflation Reduction Act provided $369 billion in tax credits for distributed energy resources and energy efficiency projects

- Tax credits start with a base amount and additional incentives can be awarded related to:
  - Domestic content
  - Prevailing wage and apprenticeship (PWA) standards
  - Designated communities
- Opened Elective Pay (“direct pay”) opportunities for 12 tax credits

Resources for Claiming Tax Credits:

- Clean vehicle and energy credits | Internal Revenue Service
- 5 Tips for Using the IRA's Direct Pay Provision for Clean Energy | World Resources Institute (wri.org)
- local-infrastructure-hub-ira-roadmap-for-cities.pdf (cityrenewables.org)
- Elective pay and transferability | Internal Revenue Service (irs.gov)

Fleet Funding Opportunities

Program	Eligible Activities	Available Funding	Funding Amount	Key Dates
North Texas Diesel Emissions Reduction Project	Replace diesel vehicles with a GVWR of over 16,001 or diesel equipment and drayage with GVWR of over 33,001 lbs Replace diesel transport refrigeration unit with all-electric or install EPA verified idle reduction technologies	~$1.2M available	Up to 45% for zero-emission vehicle Up to 35% for CARB Low NO_X Vehicle Up to 25% for all other fuels	NCTCOG Call for Projects is open through June 13, 2025 **Will reopen if funding available**
North Texas Zero-Emission Vehicle Project	Replace existing Class 6 and 7 heavy-duty vehicles with zero-emission vehicles, includes funding for infrastructure and workforce development	~$58M available	Battery-electric vehicle: 33% to 75% of new vehicle Hydrogen-fuel cell vehicle: 60% to 80% of new vehicle	NCTCOG Call for Projects Expected to Open Summer 2025
Texas Volkswagen Environmental Mitigation Program	Replace Diesel Equipment with Battery Electric or Fuel Cell Vehicles Class 4-8 Local Freight or Port Drayage Trucks	$20M remaining **Funds awarded on first come; first served basis**	Government Entities: Up to 100% of Incremental Cost Non-Government Entities: Up to 75% of Incremental Cost	August 31, 2025; or whenever all funds are awarded

Other AQ Funding

NCTCOG Air Quality Funding Website:
www.nctcog.org/aqfunding

Key Resources :

- National Association of State Energy Officials:
- Database of State Incentives for Renewables and Efficiency
- Alternative Fuels Data Center Laws and Incentives

Dallas Fort-Worth Air Quality Improvement Plan

Image Source: https://www.gettyimages.com/

Dallas-Fort Worth Air Quality Improvement Plan

Deliverable 1

Priority Action Plan (PAP)- Submitted March 1, 2024;
www.publicinput.com/dfwAQIP

Requirements:

- Develop Plan to Improve Air Quality Through 2030
- Basic Carbon Dioxide Equivalent (CO_2e) Emissions Inventory (EI)
- Measures (*i.e. projects, programs, or policies*)
- Analysis
- Review of Authority to Implement

Deliverable 2

Comprehensive Action Plan (CAP)-Due December 1, 2025

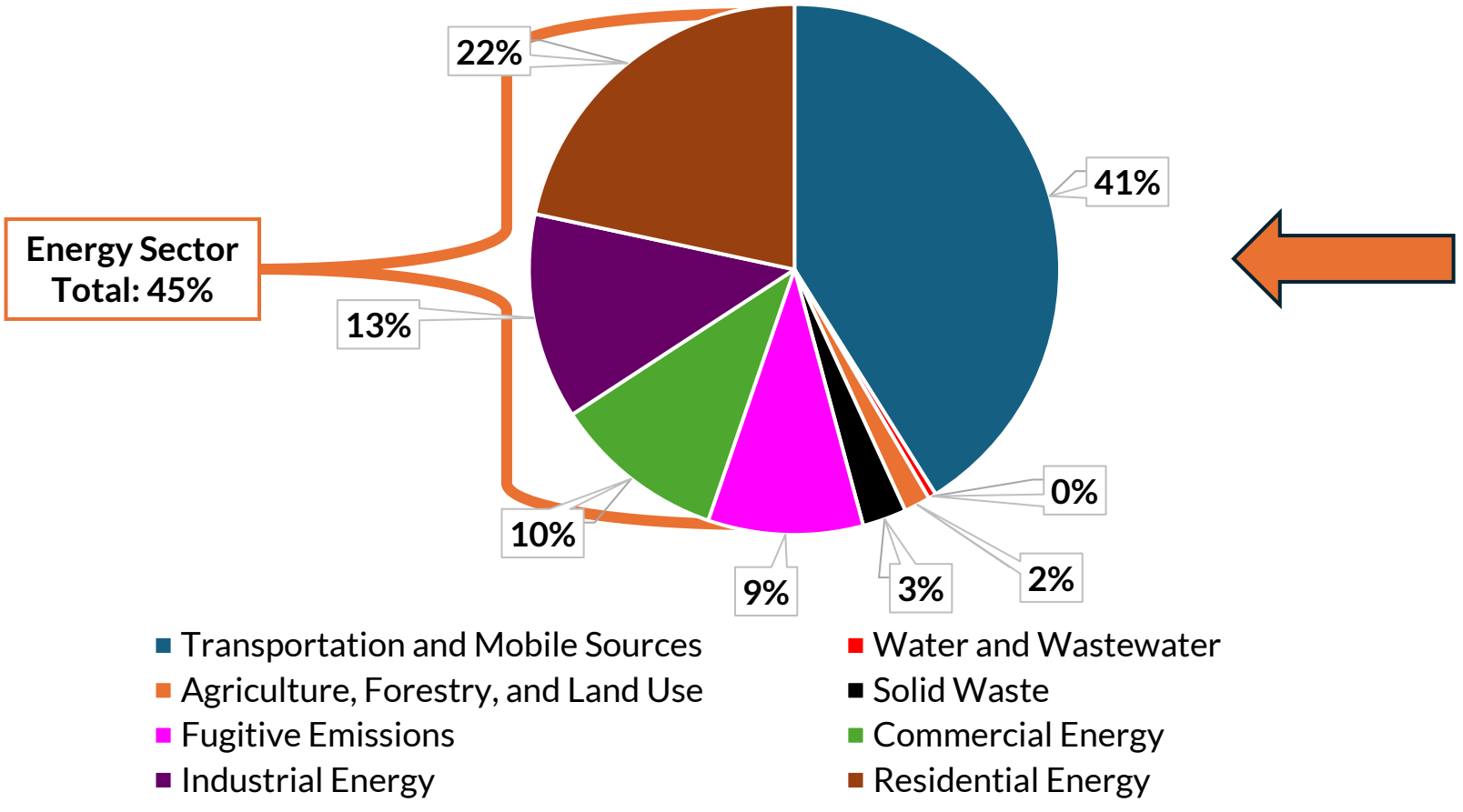
Requirements:

- Develop Plan to Improve Air Quality Through **2050**
- All PAP Requirements
- **Projections and Targets**
- Benefits Analysis
- Funding Analysis
- Workforce Analysis

The DFW AQIP development, including the PCAP and CCAP, is supported by funding from the Environmental Protection Agency's (EPA) Climate Pollution Reduction Grants (CPRG): Planning Grants

NEW- 2022 Emissions Inventory (EI)

2022 Carbon Dioxide Equivalent Emissions Inventory for
NCTCOG 16-County Region
Total of **119,131,876 metric tons of CO_2e**



Key Differences from 2019 EI:

- **NEW SECTOR**- Fugitive Emissions
- **NEW SECTOR**- Agriculture, Forestry and Land Use

DRAFT RESULTS

Source: NCTCOG

PAP Measures*

Measure can be a policy, project, or program

***Based on EPA guidance, DFW AQIP: PAP measures need updates for CAP**

Transportation

13 Measures

Energy

6 Measures

Water, Wastewater, and Watershed Management

9 Measures

Waste Management

6 Measures

Agriculture, Forestry, and Land-Use

5 Measures

Cross-Sector

5 Measures

Image Source: https://www.gettyimages.com/

CAP Measure Requirements

	Timeframe	Quantifiable Emissions Reductions?*	Sectors	Funding Analysis	Cost Estimates	Tracking Metrics	Implementing Agencies	Other Requirements
PAP	2025-2030	Yes	Priority Sectors Only	No	No	Yes	Yes	N/A
CAP	2025-2050	Yes	All Sectors	Yes	Yes	Yes	Yes	Be **specific enough** to implement and measure **Support Targets for CAP****

**Efforts which are necessary to undertake to achieve a measure but do not result in direct emission reductions (ex: workforce development) can be "bundled" with a measure.*

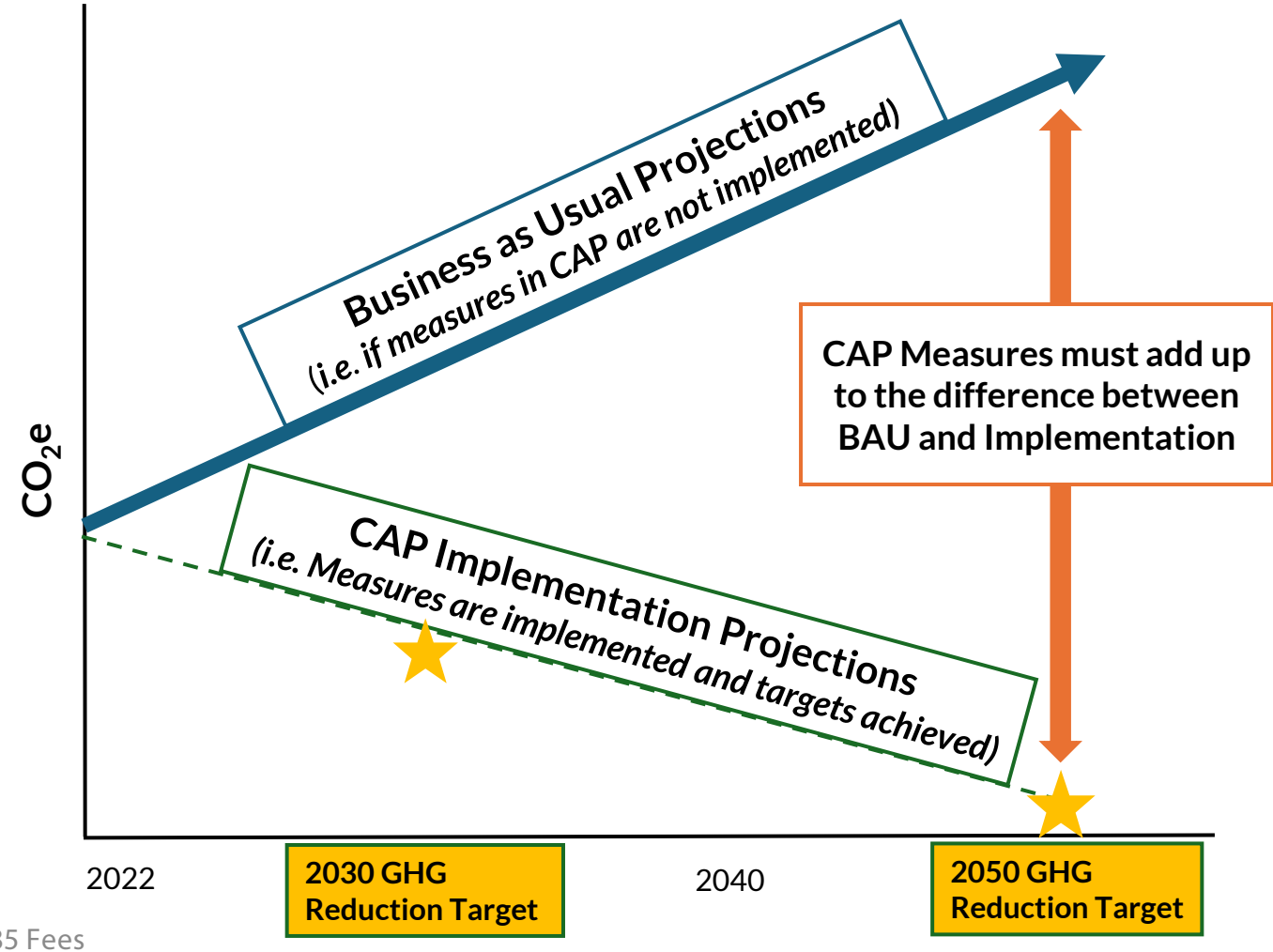
Targets should be **actionable, ambitious, achievable

CAP Measure and Targets

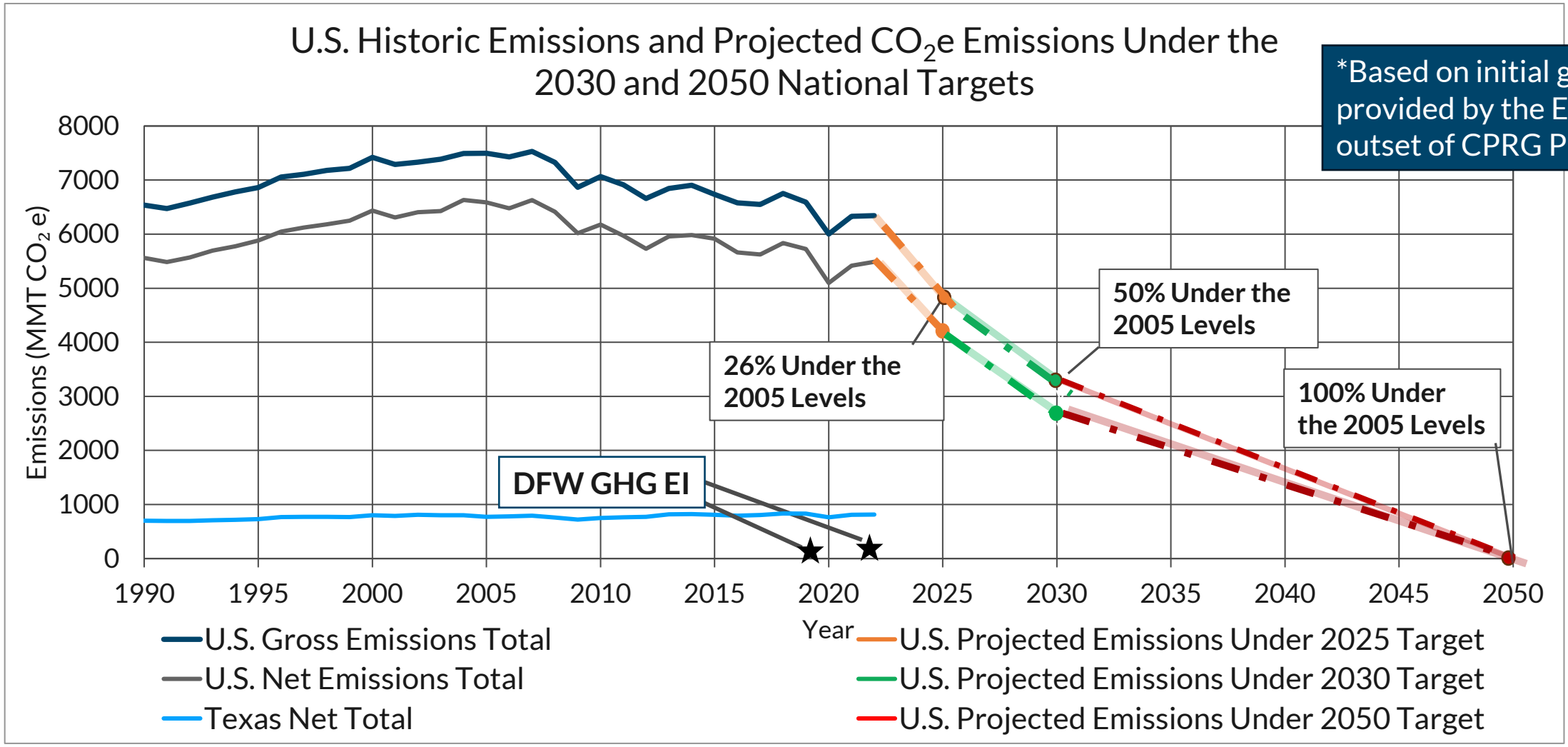
Example CAP Measures

Example EPA Measure with Appropriate Specification	Measure that is too Broad
Alter 10 building codes to include IECC Net Zero Appendices	Reduce energy use in residential sector
Shift towards a clean renewable and resilient power grid through early retirement of coal/natural gas power plants at 500 MW per year	Achieve a carbon neutral electricity grid
Install 10 electric vehicle chargers in specific communities	Reduce transportation emissions by 50%

Example CAP Targets

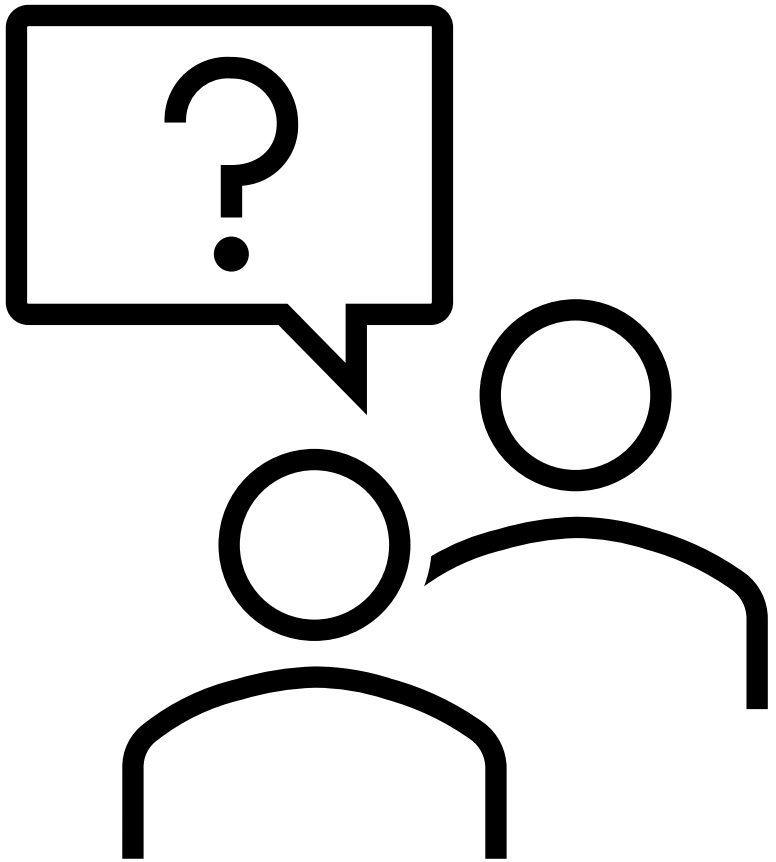


CAP Targets and Goals*



Source: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-andsinks-1990-2022.

Q & A



Poll- Mentimeter

What measures has your organization implemented to improve air quality?

Are there measures industrial organizations can implement you recommend NCTCOG include in the DFW AQIP?

What kind of support (local, state, or federal) does your organization need to implement measures?

Example: regional meetings, meetings hosted by state, funding, technical assistance, other

Does your organization have targets to reduce carbon dioxide or criteria pollutants? If yes, are they publicly available?

https://www.menti.com/al697kfj92vx

DALLAS-FORT WORTH AIR QUALITY IMPROVEMENT PLAN

Funded through the Environmental Protection Agency's Climate Pollution Reduction Grants

Information and email-blast sign-up available at: www.publicinput.com/dfwAQIP

Interested in joining stakeholder group? Submit a letter of support

Survey available online: www.publicinput.com/dfwAQIP-Survey

Stakeholder Listening Sessions will occur in Summer 2025

Draft DFW AQIP: CAP will be available in Fall 2025

Contact Us

Susan Alvarez, P.E., CFM
Director of Environment & Development
salvarez@nctcog.org

Alyssa Knox
Environment & Development Planner
aknox@nctcog.org

Corinne Buckley
Environment & Development Planner
cbuckley@nctcog.org

Chris Klaus
Senior Program Manager
cklaus@nctcog.org

Lori Clark
Senior Program Manager & DFWCC Director
lclark@nctcog.org

Savana Nance
Principal Air Quality Planner
snance@nctcog.org

Vivek Thimmavajjhala
Senior Transportation System Modeler
vthimmavajjhala@nctcog.org

Daniela Tower
Air Quality Planner
dtower@nctcog.org

NO_x and VOC Emissions Apportionment

DFW 10-County Nonattainment Area Nitrogen Oxides (NOx) (tons/day)						
Sources	Analysis Years				% Change from 2006 to 2023	% Change from 2023 to 2026
	2006	2017	2023	2026		
On-Road Mobile	284.27	130.77	72.30	60.20	-75%	-17%
Non-Road Mobile	98.06	45.54	34.38	32.03	-65%	-7%
Off-Road Mobile	32.92	25.24	23.59	24.59	-28%	4%
Point (All sources)	57.55	54.80	42.34	42.00	-26%	-1%
Oil & Gas (Production & Drill Rigs)	80.07	13.87	3.61	1.86	-95%	-48%
Area	29.02	26.55	31.33	32.17	8%	3%
Total	**581.89**	**296.77**	**207.55**	**192.85**	**-64%**	**-7%**
DFW 10-County Nonattainment Area Volatile Organic Compounds (VOC) (tons/day)						
Sources	Analysis Years				% Change from 2006 to 2023	% Change from 2023 to 2026
	2006	2017	2023	2026		
On-Road Mobile	116.50	64.91	38.74	33.27	-67%	-14%
Non-Road Mobile	64.69	34.01	42.68	44.12	-34%	3%
Off-Road Mobile	5.74	3.66	4.60	4.86	-20%	6%
Point (All sources)	50.44	47.38	23.53	23.56	-53%	0%
Oil & Gas (Production & Drill Rigs)	44.88	32.18	24.72	11.80	-45%	-52%
Area	290.46	236.70	265.77	275.73	-9%	4%
Total	**572.71**	**418.84**	**400.04**	**393.34**	**-30%**	**-2%**