2008 and 2015 Ozone NAAQS Schedule Progression
Implementation of the 2015 Ozone NAAQS

- Initial classification based upon air quality
- Failure to attain by the deadline results in “bump up” to next classification
- Requirements based upon classification
  - Local controls for moderate and above
Implementation of both the 2008 and 2015 Ozone NAAQS
Houston Area Design Values

- **Design Values:**
  - 2010-2012 88 ppb
  - 2011-2013 87 ppb
  - 2012-2014 81 ppb
  - **2013-2015 DV 80 ppb**
  - 2014-2016 79 ppb
  - 2015-2017 Year to Date 79 ppb

- **Governor's Current Recommendations:**
  - Full certified data available for 10/2018 designations (Marginal = 71-80 ppb)
2015 Standard Progression – Delay Designations to Oct. 1, 2018

- EPA has 6 months to complete findings of failure to attain and reclassify areas ("bump-up") and so "bump ups" would have occurred before revocation
- "Bump ups" from "moderate" to "serious" nonattainment lowers the major source threshold (enacting major source permitting on many new and existing smaller sources) and increases the offset ratio required to permit

"Anti-backsliding" requirements apply until an area attains 75 ppb (relative to classification at the time of revocation – largely "serious")

- Based upon 2015-2017 data, anticipated the same 68 areas will go into nonattainment plus an additional ~ two dozen and some of the 68 will start off with an initial classification of "moderate" instead of "marginal", triggering development of a "demonstration SIP" (including state rulemaking)
- Controls must be installed prior to the last full year of ozone data prior to the relevant attainment deadline (controls toward a "demonstration SIP" required for "moderate" and above) – this is the same date as Dec. 31, 2017 designations because many areas have ozone seasons spanning 12 months

Requirements in place when a standard is revoked persist
<table>
<thead>
<tr>
<th>Level</th>
<th>NSR Offset Ratio</th>
<th>Major Source Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extreme (20 yrs to attain)</td>
<td>1.5:1 Extreme</td>
<td>10</td>
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<tr>
<td>Severe (15/17 yrs to attain)</td>
<td>1.3:1 Severe</td>
<td>25</td>
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<tr>
<td>Serious (9 yrs to attain)</td>
<td>1.2:1 Serious</td>
<td>50</td>
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<tr>
<td>Moderate (6 yrs to attain)</td>
<td>1.15:1 Moderate</td>
<td>100</td>
</tr>
<tr>
<td>Marginal (3 yrs to attain)</td>
<td>1:1 Marginal</td>
<td>100</td>
</tr>
</tbody>
</table>