

Appendix 9.20

Alternate 2005 TxLED Calculation

Alternate TxLED Calculation for 2005

At the time this conformity was conducted, the Texas Commission on Environmental Quality (TCEQ) was in the process of modifying the implementation of the TxLED program. The program was initially scheduled to begin by April 1, 2005. A request was filed with TCEQ to delay the start date of the measure 18 months, to October 1, 2006. The measure being considered by the TCEQ Commissioners would delay the start of the TxLED program 6 months, to October 1, 2005. The action the TCEQ Commissioners will take is uncertain.

TxLED benefits were included as part of the 2005 ROP conformity analysis. The purpose of this Appendix is to demonstrate that the 2005 ROP conformity analysis would pass the budget even if the TxLED program was not in effect for the year 2005. This “no TxLED” run, coupled with run containing TxLED contained in the conformity analysis, covers the range of actions that could be taken for the 2005 ROP analysis year.

Modeling

The modeling for the “no TxLED” alternate run follows the exact same process as that used in the 2005 ROP conformity analysis, with one exception: RATEADJV was not used to modify the emission factors for TxLED benefits. Thus, the emission factors run through IMPSUM do not have the TxLED benefits incorporated into them. The TxLED program affects only NOx emissions; there is no impact on VOC emissions as a result of the TxLED program.

This analysis makes use of the emission factors generated by the run for the original 2005 conformity analysis from the step before the TxLED correction was applied. This assures that a true comparison is being made between the “with” and “without” scenarios.

While the emission factors already existed, IMPSUM had to be run for the “no TxLED” scenario. The output was sent to a designated file labeled “noLED.” Contents of this file are available in the electronic documentation. Results are located in the “2005CS_hga_ems.TAB” file.

Results

The summarized results are located in Table 1. The VOC numbers are not affected by the TxLED program and, thus, are not displayed here. No post-processing adjustments, such as VMEP or TERMS, have been applied to these numbers.

Table 1: 2005 TxLED Credits

	TxLED	no TxLED	Budget
NOx (tpd)	246.5	253.9	257.3

The numbers above represent NOx emissions summed over the eight-county nonattainment area over a 24-hour period. Even without the TxLED program, the NOx passes the budget.

Whatever action is taken by the TCEQ Commissioners, the 2005 ROP analysis still demonstrates conformity to the budget.