



Frequently Asked Questions

Air Quality

Note: If you have questions concerning the air quality process, please forward them to the ENV Air Quality Specialist. This document will be updated periodically when new questions are submitted.

Questions:

1. [Where can I find guidance for preparing environmental documentation for air quality?](#)
2. [How do I use the air quality toolkit and where do I start?](#)
3. [What air quality requirements apply to transportation projects?](#)
4. [Should I prepare a generic air quality technical report that encompasses all of the air quality requirements?](#)
5. [What resources are available to answer the project scoping questions?](#)
6. [How do I determine whether my project is consistent with transportation plans and programs?](#)
7. [Can I clear projects using develop authority in nonattainment areas?](#)
8. [Are there Environmental Permits, Issues and Commitments \(EPICs\) associated with air quality?](#)
9. [How should I setup Environmental Compliance Oversight System \(ECOS\) to document air quality compliance?](#)
10. [How do we handle greenhouse gases and climate change in National Environmental Policy Act \(NEPA\) documents?](#)
11. [Does the Environmental Affairs Division \(ENV\) provide air quality training?](#)
12. [Are there additional resources to help respond to public comments regarding air quality?](#)



Answers:

1. [Where can I find guidance for preparing environmental documentation for air quality?](#)

ENV has an entire [Air Quality Toolkit](#) full of guidance and reference material to help with the development of the environmental documentation for air quality. The toolkit includes the *Environmental Handbook for Air Quality*, multiple standard operating procedures (SOPs)¹, documentation standards, ECOS instructions, and various reference materials. The toolkit has all the information necessary to develop and document air quality compliance for projects, from scoping to the standard template language for environmental documents.

2. [How do I use the air quality toolkit and where do I start?](#)

The [Air Quality Toolkit](#) contains many materials and can be overwhelming; however, it is organized to make it more user-friendly.

The *Environmental Handbook for Air Quality* is a good starting point because it provides both a regulatory background for transportation air quality requirements and establishes the process to scope your projects for those requirements. Other scoping tools, such as the Air Quality Compliance Flowcharts, the Scope Development Tool, and the Work Plan Development Tool in ECOS are all rooted in the same scoping process that is described in the Environmental Handbook for Air Quality.

Once you scope the specific air quality requirements that apply, you can open the specific SOP for that requirement and follow the step-by-step procedures to address that aspect of air quality for your project. There is a specific SOP for each potential air quality requirement that may apply (i.e., conformity, hot-spot, carbon monoxide (CO) Traffic Air Quality Analysis (TAQA), mobile source air toxics (MSAT), project-level congestion management process (CMP), and construction emissions). Each SOP will identify when a specific form, technical report, or resource document should be used.

When an SOP directs you to develop a technical report (i.e., CO TAQA, quantitative MSAT, or hot-spot), there are specific documentation standards that outline what to include and the format to use. When technical reports are developed by consultants or local government partners, there are optional review standards available in the toolkit that can be used to evaluate them for completeness.

The *SOP for Preparing Air Quality Statements*² includes the recommended language that may be used in environmental documents to summarize the outcome of the various air quality scoping and analyses. It contains both negative declaration statements for times when a requirement does not apply to a project, as well as, language to summarize results of technical reports for specific air quality analyses.

¹ SOPs may soon be replaced by 'ECOS 1-pagers' but will essentially serve the same function.

² The name of this document may be revised in the near future



Lastly, there are ECOS instructions in the toolkit. The ***Detailed Steps in ECOS for Air Quality*** instructions guide you through how to set up the air quality forms in ECOS at scoping, and identify when and with whom to create reviews and coordination tasks for completed documents.

3. **[What air quality requirements apply to transportation projects?](#)**

There are seven air quality requirements that generally result from project scoping:

- Project-level conformity (consistency check),
- Project-level conformity (hot-spot requirements),
- CO TAQA,
- MSAT,
- Project-level CMP,
- Construction emission disclosure, and
- Texas Commission on Environmental Quality (TCEQ) coordination.

Not all of these will be required for all projects. The Air Quality Compliance Flowcharts in the [Air Quality Toolkit](#) provide a quick reference tool to determine which of these will apply to a particular project.

4. **[Should I prepare a generic air quality technical report that encompasses all of the air quality requirements?](#)**

Usually the answer is no. Under most circumstances, it is not necessary and duplicates other environmental documentation. The *Environmental Handbook for Air Quality* and ECOS instructions currently only recommend a generic air quality technical report when you either want to perform early coordination with TCEQ for an EA³ or when you have the rare project that has a federal lead agency other than FHWA or FTA, such as: the Federal Railroad Administration (FRA), the Federal Aviation Administration (FAA), or Surface Transportation Board (STB). Instead of a generic technical report to address all air quality requirements, specific air quality technical reports should be prepared for each individual requirement, such as: the conformity report form, a hot-spot technical report, a qualitative or quantitative MSAT technical report, or a CO TAQA technical report.

5. **[What resources are available to answer the project scoping questions?](#)**

There are multiple resources that can be referenced, but the first steps would include collecting information about your proposed project and where it is located. There is a document in the [Air Quality Toolkit](#) titled *Texas Air Quality Nonattainment or Attainment-Maintenance Areas and Counties*, which is updated with the latest nonattainment counties, designations, and conforming transportation plans. If the project is located within a nonattainment area, its listing in the [transportation plan](#) can give insight as to whether the project is regionally significant or even exempt from conformity requirements. Preliminary traffic data or a working knowledge of the project corridor can be used to determine if predicted design year traffic will come close to the 140,000 vehicle per day threshold for the CO TAQA and MSAT analysis triggers; if there is a possibility it could exceed the threshold once the NEPA traffic data becomes available, then

³ An update to the TCEQ MOU rule is pending for 2019 which, if it becomes effective, would supersede this option for performing early coordination via an air quality technical report.

during scoping assume it will exceed as a conservative approach. Also, the ENV air quality specialist is available to provide support for scoping questions.

6. [How do I determine whether my project is consistent with transportation plans and programs?](#)

Projects in nonattainment or maintenance areas for ozone, CO, particulate matter (PM), or nitrogen dioxide (NO₂) and that are not otherwise exempt from conformity are required to obtain project-level conformity determinations. Conformity requires that the project is consistent with the applicable transportation plan [Metropolitan Transportation Plan (MTP) or Regional Transportation Plan (RTP)] and the applicable program [Transportation Improvement Program (TIP) or Statewide Transportation Improvement Program (STIP)]. Projects requiring a conformity determination will need to show that they are consistent with regard to the design concept and scope described in the MTP/RTP and TIP/STIP. This includes having both the same type of facility and number of lanes. Consistency also means that the project is fiscally constrained to the cost identified in the transportation plan (no more than 50% greater). The timeframe to complete a project must also fall within a certain window of time as identified in the MTP/RTP. The *Transportation Conformity Report Form* in the [Air Quality Toolkit](#) is currently used to demonstrate project-level conformity and has step-by-step instructions for determining and documenting project consistency.

If a project is within an attainment/unclassifiable area or is exempt from a project-level conformity determination, then consistency with the applicable transportation plan and program is not an air quality requirement.

7. [Can I clear projects using develop authority in nonattainment areas?](#)

If the project is subject to conformity, the short answer is no. Develop authority is intended to allow projects to proceed to NEPA clearance even when not included in the applicable TIP/STIP and, in contrast, conformity requires projects to be included in and consistent with the applicable TIP/STIP. This is why the January 2016 ENV memo titled *Planning and Programming Consistency for FHWA Projects*, established (in an underlined sentence) that develop authority does not supersede compliance with air conformity requirements.

8. [Are there EPICs associated with air quality?](#)

There are not usually EPICs associated with air quality. This is because all of the air quality evaluations and coordinations must occur prior to the project decision and the applicable construction mitigation is built into the specifications (i.e., dust suppression), into the construction contract (i.e., compliance with applicable permitting laws), or is voluntary (i.e., TERP). However, it is possible that additional voluntary commitments could be made which would require an EPIC, such as requiring the completion an air quality construction plan. Discuss any potential commitments that would require an EPIC with the ENV air quality specialist.

9. [How should I set up ECOS to document air quality compliance?](#)

Please see the *Detailed Steps in Texas ECOS for Air Quality* document, which is included in the [air quality toolkit](#). The instructions provide a two-step process: 1) to identify the ECOS air quality activities (forms) to create at project scoping, and 2) to identify the documents to upload, people required to review those documents, and coordinations necessary for each air quality activity (form) opened during the scoping process. In this manner, ECOS serves as both a planning tool and documentation record. If the instructions are followed, then once all of the air quality activities

in ECOS are approved and closed, all of the air quality requirements for environmental clearance will have been addressed.

10. [How do I handle greenhouse gases and climate change in NEPA documents?](#)

This topic is currently being addressed under cumulative impacts and not under air quality. There are no regulatory requirements at the project level regarding greenhouse gases and climate change under NEPA. However, realizing that there is public concern on the topic, TxDOT developed a programmatic approach using a statewide *Greenhouse Gas and Climate Change Technical Report* at: <https://www.txdot.gov/inside-txdot/division/environmental/compliance-toolkits/impacts.html>. The report should be referenced for EIS projects and a short summary provided under the cumulative impacts analysis section. Contact the Human Environment Team Lead for additional questions on this topic.

11. [Does the Environmental Affairs Division \(ENV\) provide air quality training?](#)

Yes. Basic air quality 101 training is provided annually and is presented as three separate courses based on the applicability of air quality requirements. **ENV 111** is the all-inclusive 6-hour course on air quality, which goes into detail on all of the regulatory compliance requirements and is recommended for areas designated as nonattainment or maintenance. **ENV 109** is a 4-hour course for areas that are in attainment but may have enough traffic volumes in their corridors to trigger NEPA analyses like CO TAQA or quantitative MSAT. **ENV 108** is a 2-hour course for areas that are in attainment and have very little likelihood of needing a quantitative air quality analysis. ENV has also teamed up with FHWA to provide project-level conformity, CO TAQA, and quantitative MSAT training. Please contact the ENV air quality specialist if you wish to schedule air quality training in your area.

12. [Are there additional resources available to help respond to public comments regarding air quality?](#)

Yes. There have been a few projects where the project sponsor determined that it would be useful to provide additional information to the public. The following resources may provide additional support for responding to public comments or concerns:

- [TCEQ's Air Pollutant Watch List \(APWL\)](#): This is a great resource for identifying counties that are under watch by TCEQ because of concerns related to air toxics, such as the Mobile Source Air Toxics.
- [TCEQ's Toxicological Evaluations of Ambient Air Monitoring Data](#): These are annual evaluations of air toxics monitoring data provided by TCEQ toxicology. These reports are good reference materials when responding to questions on the status of air toxics in the ambient environment.
- [TCEQ's Trends Report](#): This report includes modeling performed by TCEQ for on-road emissions in all Texas counties from 1999-2050. This is particularly useful for identifying how air quality is expected to change over time for transportation-related criteria pollutants and their precursors. A recurring theme from this modeling is that even with increasing future vehicle miles traveled (VMT), there is a trend of decreasing future emissions.
- [EPA Monitoring Data](#): EPA maintains a database of monitored data from around the country for multiple pollutants. This is useful for being able to demonstrate what actual monitored values have been for specific areas and for identifying past trends.



- ENV Air Quality Specialist: The ENV air quality specialist is always available to answer questions and help respond to public comments. There are additional studies and regulatory references that can be provided for answering questions, depending on the circumstances of the project and the nature of the comments.



Appendix A

The following table shows the revision history for this guidance document.

Revision History	
Effective Date Month, Year	Reason for and Description of Change
February 2019	Version 1 was released