

COMMENTS ON AIR PERMITS FOR MAJOR SOURCES IN COUNTIES ADJACENT TO THE HOUSTON-GALVESTON-BRAZORIA (HGB) OZONE NONATTAINMENT AREA

Background

The HGB area has made significant strides towards improving air quality in recent years through a concerted effort and considerable financial and resource investment by area governments and local industry. The expected strengthening of the ozone standard in the near future by the Environmental Protection Agency (EPA) will make achieving that standard a more daunting exercise. RAQPC is concerned that ozone precursor emissions that are authorized by TCEQ permitting actions in counties adjacent to the HGB nonattainment area could potentially hinder the HGB area's future ability to reach attainment.

Current Situation

RAQPC believes that TCEQ should examine the potential significance of impact from increased NO_x and VOC emissions on the HGB ozone nonattainment area during the review of any Prevention of Significant Deterioration (PSD) permit application for a source in a county adjacent to the HGB ozone nonattainment area. The review should include any required modeling associated with the permit application. Such a review will help ensure that the past, current and future ozone reduction efforts and investments made in HGB continue to be effective and not significantly impacted by emissions sources outside HGB.

RAQPC recognizes that TCEQ has limited EPA technical guidance regarding appropriate screening tools and ozone modeling protocols for permitting to carry out its tasks in the most efficient manner. RAQPC encourages TCEQ to continue to seek further guidance from EPA.

Action Requested

Request authorization to submit comments to the Texas Commission on Environmental Quality on air permits for major sources in counties adjacent to the Houston-Galveston-Brazoria ozone nonattainment area consistent with the positions explained above.