

October 1, 2010

Mr. Mark Vickery
Executive Director
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, Texas 78711-3087

Mr. Richard Hyde, P.E.
Deputy Director, Office of Permitting and Registration
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, Texas 78711-3087

RE: Air Permits for Major Sources in Counties Adjacent to the Houston-Galveston-Brazoria Ozone Nonattainment Area

Dear Mr. Vickery and Mr. Hyde:

The Houston-Galveston Area Council (H-GAC) is the Council of Governments of a thirteen-county Gulf Coast Planning region of Texas which includes the eight county Houston-Galveston-Brazoria (HGB) ozone nonattainment area. H-GAC's mission is to serve as an instrument of local government cooperation promoting the region's orderly development and the safety and welfare of its citizens.

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 strengthen of the ozone standard in the near future by the Environmental Protection Agency (EPA) will make achieving that standard a more daunting exercise. H-GAC 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.

H-GAC requests that TCEQ examine the potential significance of impact from increased NOx 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.

H-GAC 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. H-GAC encourages TCEQ to continue to seek further guidance from EPA.

It is crucial that our local governments, elected officials, and industry continue to take the appropriate steps to allow HGB to attain the ozone standard while protecting our region's economic future and our previous efforts and investments towards that end. H-GAC is committed to this shared effort to develop the region while protecting the health and well-being of our citizens.

Sincerely,

Jack Steele

JS/jbf

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