

February 22, 2010

U.S. Environmental Protection Agency
Mail Code 6102T
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Washington, D.C. 20460
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Re: National Ambient Air Quality Standards for Ozone,
Docket ID No. **EPA-HQ-OAR-2005-0172**

Dear Sir or Madam:

On January 19, 2010, the U. S. Environmental Protection Agency (EPA) proposed to revise the National Ambient Air Quality Standard (NAAQS) for Ozone (O₃) (74 Federal Register 2938). EPA is proposing to revise the standard by establishing the 8-hour standard between 0.060 – 0.070 ppm O₃. The Houston-Galveston Area Council (H-GAC) recognizes that this range is based upon scientific evidence supported by the Clean Air Scientific Advisory Committee (CASAC). The local governments that make up H-GAC desire clean air and healthy citizens in their region. H-GAC understands that the CASAC considered the standard of safety for the public, and that the scientists agreed that the range is protective of human health and is therefore, reasonable and appropriate. However, while determining a specific number within the 0.060 - 0.070 ppm range, H-GAC would ask you to consider a region's O₃ background, O₃ reducing progress, the needed and added competition for resources, and the time frame needed for the revision.

The Houston-Galveston-Brazoria (HGB) area comprises of eight counties that are located in the Texas Gulf. Like many areas, our weather patterns are seasonal. During our high O₃ days, the wind currents transport background O₃ differently. This can increase our typical background O₃ level from 0.020 ppm to 0.05 ppm (and even higher in some circumstances). As background O₃ levels increase, the difficulty of remaining in compliance with the O₃ standards also increase.

H-GAC and its partners continue to work together to reduce NO_x. There is less opportunity for O₃ to form as NO_x is reduced. The strategy is working, as the HGB area met the 8-hour standard of 0.085 ppm in 2009 for the first time since going into nonattainment status. Meeting this goal ahead of schedule was accomplished by sizable investments of businesses and industries, and several emission reduction programs, strategies, and agreements funded by Federal, State and Local funds. These programs include, but are not limited to, Voluntary Mobile Emission Reduction Program, Clean Cities / Clean Vehicles, AirCheck Texas Repair & Replacement Assistance Programs, Diesel Emission Reduction Act, Texas Emission Reduction Plans, and Commute Solutions. As the NAAQS standards are strengthened, the HGB area will need additional funding and additional programs to achieve compliance. Furthermore, special attention will need to be given to protect the validity of the investments made by our businesses and industries in anticipation of meeting the previous standard. H-GAC encourages that the

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timing of determining national industrial standards be better coordinated with changing pollutant standards, and that this coordination be done at the Federal level

It is anticipated that many additional areas will be classified as noncompliant as the NAAQS for O₃ are strengthened. When H-GAC looks toward the future, we anticipate that our population will surpass natural growth in 2020. As stated previously, the HGB region will need continual and additional Federal and State resources to remain in compliance. This request becomes more urgent when competing with additional noncompliant areas for those resources, and becomes paramount as our population begins to show signs of exceeding normal growth rates.

In addition to acquiring the proper funding and participation in emission reduction programs, there are several other elements that will need to take place in order to show compliance with the strengthened O₃ NAAQS. These activities will make meeting the compliance deadline more difficult to accomplish. For instance, the modeling that will be required for the HGB area, and the additional areas, may overload the workload of the State, thus cause a delay in establishing how much work there is to be done. A discrepancy remains between the time that industrial standards are set and technology is invented and used to meet the standards. Furthermore, with additional and larger SIPs, the State will need more assistance in SIP management. The HGB will require assistance at the Federal level while establishing legitimate and reachable milestones in the time line.

Finally, the EPA is in the process of establishing new levels for many different pollutants, and as a result some regions are forced to run parallel processes to plan for reductions of those pollutants. H-GAC urges the agency to consider the benefits of using a multi-pollutant approach to air quality planning. H-GAC believes it could result in a more efficient and effective process and ultimately, more timely and greater improvements in air quality.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Jack Steele

JS/jbf

Cc: Ms. Susan Lyon Stone, Health and Environmental Impacts Division, EPA