

December 1, 2010

Deleted: October

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 Neighboring the Houston-Galveston-Brazoria Ozone Nonattainment Area

Dear Mr. Vickery and Mr. Hyde:

I am writing with recommendations from the Houston-Galveston Area Council (H-GAC) concerning air permitting of major sources in counties neighboring the Houston-Galveston-Brazoria (HGB) non-attainment area. H-GAC's Board of Directors endorsed these recommendations, prepared by its Regional Air Quality Planning Committee.

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. H-GAC is concerned that ozone precursor emissions that are authorized by TCEQ permitting actions in counties neighboring the nonattainment area could potentially hinder the area's future ability to reach attainment, and have the potential to adversely affect public health.

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 recommends that TCEQ seek further EPA guidance in modeling and permitting from EPA. Obtaining this guidance will improve the permitting process and provide greater clarity and certainty to both the regulated community and the public.

H-GAC also requests that TCEQ examine the potential significance of impacts from increased NOx and VOC emissions on public health and the ozone nonattainment area during the review of any Prevention of Significant Deterioration (PSD) permit application for a source in a county neighboring the HGB ozone nonattainment area. The review should include any required

Deleted: The Houston-Galveston Area Council (

Moved (insertion) [2]

Deleted: to

Deleted: HGB

Deleted: HGB

Formatted: Indent: First line: 0.5"

Moved (insertion) [1]

Deleted:) 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. This letter addresses H-GAC's concerns regarding modeling required for permitting major sources of air emissions outside the eight-county HGB ozone nonattainment area. These operations also raise important issues related to water use and water quality; those issues are not addressed here. ¶

Deleted: encourages

Deleted:

Deleted: to continue to

Comment [h1]:

Comment [h2]:

Moved up [2]: 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. H-GAC is concerned that ozone precursor emissions that are authorized by TCEQ permitting actions in counties neighboring to the HGB nonattainment area could potentially hinder the HGB area's future ability to reach attainment, and have the potential to adversely affect public health. ¶

Deleted: ¶

Formatted: Indent: First line: 0.5"

Deleted: HGB

modeling associated with the permit application. Such a review will help ensure that ozone reduction efforts and investments made in [the nonattainment area](#) continue to be effective and not significantly impacted by emissions sources outside [the area](#).

It is crucial that our local governments, elected officials, and industry continue to take the appropriate steps to allow [the area](#) to attain the ozone standard in an effort to protect public health, 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

Deleted: the past, current and future

Deleted: -

Deleted: HGB

Deleted: HGB

Deleted: As noted above, additional guidance regarding modeling and permitting should be requested from EPA. ¶

¶ 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.

Moved up [1]: H-GAC recognizes that TCEQ has 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.¶

Formatted: Indent: First line: 0.25"

Deleted: ¶

Deleted: HGB

Deleted: ¶

Formatted: Level 3, Pattern: Clear (White)