

February 17, 2009

Mr. Brandt Mannchen  
Lone Star Chapter of the Sierra Club  
Houston Regional Group  
P.O. Box 3021  
Houston, TX 77253-3021

Dear Mr. Mannchen:

Thank you for your comments regarding the 2006 and 2008 mobile source Control Measures for the Houston-Galveston-Brazoria 8-Hour Ozone State Implementation Plan (SIP). The Texas Commission on Environmental Quality (TCEQ) and H-GAC continue to examine a wide range of voluntary control measures. Additionally, your letter commented specifically on sections of the report as well as specific control measures. Responses to each of these comments follow:

- 1) **Page 1-1**, in the first paragraph of **“1. Background and Purpose of Study”**: Both statements are correct. The primary objective is to reduce NO<sub>x</sub>. Strategies are identified in the study that will help the region achieve this primary objective. Many of the strategies reduce volatile organic compounds (VOCs) as well as nitrogen oxides (NO<sub>x</sub>).
- 2) **Page 2-1, Refining Initial Master List**: For those measures which have a minimal effect on emissions and have been grouped with other measures, the individual emission reductions resulting from these is still available in Appendices F, G, and H of the final draft control measure report.
- 3) **Page 2-1, Evaluating Feasibility and Potential for Emission Reductions**: The word “model” is used in this sentence as a reference for calculations done based on certain assumptions.
- 4) **Page 3-1, Qualitative Review of Master List**: four criteria were developed by the EPA to guide state and local governments in developing control strategies for the SIP, to improve local air quality, and comply with federal regulations. Satisfaction of these criteria is necessary to generate an emission reduction that is creditable in the SIP.

Emission reductions are “Permanent” if they can be ensured that no emission increase (compared emissions in the absence of the project) occur over the time the emission reductions are relied upon in the SIP. They are “Surplus” as long as they not otherwise relied on other Air quality-related programs in the SIP, SIP-related requirements, other State air quality programs adopted but not in the SIP, or federal rules that focus on reducing criteria pollutants or their precursors. They are “Quantifiable” if they can be reliably measured or determined, and if these determinations can be independently verified and replicated. Emission reductions are “Enforceable” if they employ a methodology to ensure that the promised emission reduction actually occurs. If a program cannot be created (or defined), then the Control Measure does not satisfy the enforceable requirement of the four criteria, and is not selected for the “Short List”.

Professional experience and judgment were factors critiqued during the consultant selection process. ENVIRON uses professional judgment based in professional experience, research, and identification of Control Measures being enforced in this and other regions. Many Control Measures that were not enforceable were excluded from this study. This practice was followed to focus discussion, time, energy, and resources upon Control Measures that could either satisfy all four criteria, or ENVIRON believed that the region should determine the feasibility or acceptability of the Control Measure.

- 5) **Page 4-1, 4. Summary of Measures:** We refer you to answers given to questions and comments made in item number 4 above. Regarding best professional judgment, this was used to establish the list of Control Measures within the study. Professional judgment encompasses many facets including professional experiences, knowledge of best practices, research of the ingenuity and improvement of technology, observing the success of similar Control Measures currently being used inside and outside the region, and studying the feasibility of near future possibilities.
- 6) **Pages 4-2 through 4-22, Table 4-1, On-road vehicle emission reduction measures:** H-GAC appreciates Sierra Club's comments on this list of measures. H-GAC has attempted to take your comments into account for those measures which you have commented on. For the questions or comments that Sierra Club made on On-Road Control Measures which did not progress to the "Short List", no response is provided.
- 7) **Pages 4-22 through 4-26, Table 4-1, Non-road vehicle emission reduction measures:** H-GAC appreciates your comments on current measures and suggestions of measures to include. H-GAC will follow the public participation process in informing decision makers of your concerns.

Throughout the latter part of 2008, H-GAC worked to quantify and refine this Master List into a Short List of measures which the Houston-region will recommend to TCEQ for implementation in early 2009 as part of the SIP. You can follow the progress and see a more detailed summary of the SIP process, the timetable for the rest of the process and the on- and non-road Control Measures at the H-GAC SIP website: <http://www.h-gac.com/taq/airquality/sip/default.aspx>

Additionally, we encourage you to continue to be involved with the SIP process. I am happy to provide more information about the form and scope of these Control Measures by phone (713-499-6695) or email ([Shelley.Whitworth@h-gac.com](mailto:Shelley.Whitworth@h-gac.com)).

Sincerely,

Shelley Whitworth  
Air Quality Program Manager