



Air Pollutant Watch List Public Comment Form

Date received: September 30, 2009

APWL Site Under Consideration

County: Jefferson

Cities: Beaumont

TCEQ Region: 10 (Beaumont)

APWL Site Number (for existing sites): APWL 1002

Pollutant(s): Benzene

Comment(s):

ExxonMobil Refining and Supply Company (ExxonMobil) supports TCEQ's proposal to remove benzene from APWL1002 located in Beaumont, Jefferson County. It is clearly evident from the monitoring data that benzene levels have remained below the current Effects Screening Level (ESL) for benzene for the past 8 years and have continued a relatively downward trend. This is indicative of the strength of TCEQ's APWL program and industry's cooperation with TCEQ in successfully addressing an air pollution concern. ExxonMobil encourages the continuation of cooperative efforts such as these to improve air quality in Texas.



Response to APWL Comment Submitted by Refining and Supply Company (ExxonMobil)

Date: January 6, 2010

APWL Site Under Consideration

County: Jefferson

Cities: Beaumont

TCEQ Region: 10 (Beaumont)

APWL Site Number (for existing sites): APWL 1002

Pollutant(s): Benzene

Comment: “ExxonMobil Refining and Supply Company (ExxonMobil) supports TCEQ’s proposal to remove benzene from APWL 1002 located in Beaumont, Jefferson County.”

Response: The TCEQ Toxicology Division thanks ExxonMobil Refining and Supply Company (ExxonMobil) for participating in the public comment period and appreciates their support of the TCEQ’s proposal to remove benzene from the Beaumont APWL 1002.

The TCEQ supports all efforts to reduce contaminants in all areas in the state of Texas. Furthermore, we encourage collaboration between the TCEQ and stakeholders to identify opportunities to make changes that will result in a reduction in air contaminants. If you have any questions, comments or suggestions, please do not hesitate to contact our office at 512-239-1795



Air Pollutant Watch List Public Comment Form

Date received: September 23, 2009

APWL Site Under Consideration

County: Jefferson

Cities: Beaumont

TCEQ Region: 10 (Beaumont)

APWL Site Number (for existing sites): APWL 1002

Pollutant(s): Sulfur dioxide and benzene

Comment(s):

The Southeast Texas Plant Managers Forum wishes to contribute comment to the proposed action by the Texas Commission on Environmental Quality to remove benzene from the Beaumont Air Pollution Watch List. The Forum had earlier commented in support on the Commission's actions to remove hydrogen sulfide from the Beaumont Air Pollution Watch List and butadiene from the Port Neches Air Pollution Watch List.

The Southeast Texas Plant Managers Forum is an organization of the 50 heavy industrial facilities in Southeast Texas, specifically Jefferson, Orange and Hardin Counties, and has for many years now installed, sponsored and supported the South East Texas Regional Planning Commission Air Monitoring System, Texas' original runtime industrial sponsored air quality monitoring system.

The Forum maintains a committee devoted to improving environmental quality and compliance, particularly air quality. I chair its Environmental Committee. I am the manager of Arkema's Beaumont chemical plant. The Forum firmly believes that a proactive effort to improve our community's environment is an important mission of area industry.

The Forum supports the proposal by the Texas Commission on Environmental Quality to remove benzene from the Beaumont Air Pollution Watch List. We continue to believe that there is strong evidence sulfur dioxide should be removed from the Beaumont Air Pollution Watch List and benzene from the Port Arthur Air Pollution Watch List.

In both cases the regulatory preconditions for removal have been complied with few or solitary exceedances which are explainable and are not representative of the air quality trends based on data collected by TCEQ and Southeast Texas Regional Planning Commission monitoring stations.

As you go forward with the proposed actions, please consider whether additional removals are justified for the Southeast Texas area based on this additional data. If TCEQ's proposed action to remove benzene from the Beaumont Air Pollution Watch list goes forward, these two will be the sole substances remaining on the watch list in Southeast Texas.

In connection with the proposed redesignation of Southeast Texas as an Ozone attainment area, removal of these items from the Air Pollution Watch List clearly evidences the commitment of industry in our community to environmental quality.

Please do not hesitate to contact us for additional information with respect to the additional watch list issues.



TCEQ Response to APWL Comment Submitted by The Southeast Texas Plant Managers Forum

Date: January 6, 2010

APWL Site Under Consideration

County: Jefferson

Cities: Beaumont

TCEQ Region: 10 (Beaumont)

APWL Site Number (for existing sites): **APWL 1002**

Pollutant(s): Sulfur dioxide and benzene

Comment: “The Forum supports the proposal by the Texas Commission on Environmental Quality to remove benzene from the Beaumont Air Pollution Watch List.”

Response: The TCEQ Toxicology Division thanks the Southeast Texas Plant Managers Forum for participating in the public comment period and appreciates their support of the TCEQ’s proposal to remove benzene from the Beaumont APWL (1002).

Comment: “We continue to believe that there is strong evidence sulfur dioxide should be removed from the Beaumont Air Pollution Watch List and benzene from the **Port Arthur** Air Pollution Watch List.”

Response:

Sulfur Dioxide -

Also included in your comments was a recommendation to remove sulfur dioxide from **APWL1002 in Beaumont**. However, our most recent mobile monitoring trip in 2007 reported levels above TCEQ's regulatory standard. Also, TCEQ has performed multiple mobile monitoring trips in the area since 2003 and off-property exceedances of TCEQ's sulfur dioxide regulatory standard have been repeatedly monitored. Thus, we will continue to support all efforts to reduce sulfur dioxide emissions in this APWL area of concern.

Benzene –

After careful consideration, we have again decided that benzene will remain on the **APWL1003 in Port Arthur** for the same reasons stated in the previous memo to The Southeast Texas Plant Managers Forum, dated March 2, 2009 that can be found at <https://www.tceq.texas.gov/assets/public/implementation/tox/apwl/nonadopted/1003-benz-explan.pdf>. Available data suggest an upward annual trend, thus we will continue to encourage efforts to reduce benzene levels in this APWL area of concern.

The TCEQ supports all efforts to reduce contaminants in all areas in the state of Texas. Furthermore, we encourage collaboration between the TCEQ and stakeholders to identify opportunities to make changes that will result in a reduction in air contaminants. If you have any questions, comments or suggestions, please do not hesitate to contact our office at 512-239-1795