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Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 18, 2013

Jennifer Noonan Edmonds, Acting Director
Office of Air Quality Planning and Standards
Environmental Protection Agency
Mail Code: 6102T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2012-0233

Re: EPA Responses to State and Tribal 2010 Sulfur Dioxide Designation Recommendations

Dear Ms. Edmonds:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to respond to the United States Environmental Protection Agency's (EPA) announcement of a public comment period for the proposed responses to state and tribal 2010 sulfur dioxide (SO₂) designation recommendations. As noted in the April 20, 2012 correspondence from Texas Governor Rick Perry to the then EPA Region 6 Administrator Al Armendariz (enclosed), ten Texas counties (Jefferson, Gregg, Ellis, Harris, Galveston, Nueces, Kaufman, El Paso, Dallas, and McLennan) should be designated attainment for the 2010 SO₂ National Ambient Air Quality Standard (NAAQS). All the remaining counties in Texas should be designated unclassifiable.

The TCEQ appreciates the EPA's willingness to work with states regarding implementation of the 2010 SO₂ NAAQS. The TCEQ also appreciates the subsequent modification to EPA expectations regarding the use of modeling alone to determine attainment of the 2010 SO₂ NAAQS. The flexibility that EPA is exhibiting on the implementation schedule for this standard is also appreciated. However, the TCEQ continues to support the attainment designation recommendation supplied by Governor Perry last year.

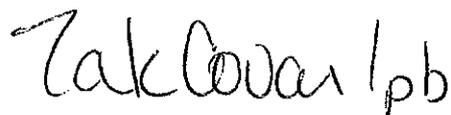
As further evidence that the ten counties noted above should be identified as attainment, the TCEQ offers the following design values table. While the 2012 SO₂ monitoring data are pre-certified, they demonstrate that design values continue to trend downward.

2011 and 2012 SO ₂ Design Values In Texas Counties with Regulatory Monitors In Parts Per Billion(ppb)		
County	2011 SO ₂ Design Value (ppb)	2012 SO ₂ Design Value (ppb)
Dallas	7*	7
El Paso	11	10
Ellis	15	14
Galveston	41	26
Gregg	61	56
Harris	42	38
Jefferson	68	51
Kaufman	14	13
McLennan	6	6
Nueces	27	25

2012 Design Values are as of 2/26/2013 and subject to change.
All data was obtained from EPA's AQS database.
*The 2011 design value for Dallas County is based on less than three years of data. Preliminary 2012 design values based on three years of data continue to indicate attainment in this county.

If there are any questions concerning the TCEQ's comments, please contact Mr. Steve Hagle, P.E., Deputy Director, Office of Air, at 512-239-1295 or steve.hagle@tceq.texas.gov. We look forward to working with the EPA throughout this process.

Sincerely,



Zak Covar
Executive Director
Texas Commission on Environmental Quality