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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 7, 2013

Ms. Margaret Walters
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Mail Code: 2723A
Washington, DC 20460

Dear Ms. Walters:

This letter is to provide comments from the Office of Air of the Texas Commission on Environmental Quality (TCEQ) on the National Program Manager's (NPM) Guidance. I have included detailed comments in the attached table, but I would like to stress two general points.

While the TCEQ appreciates the opportunity to provide comments on the NPM Guidance, we would have preferred if the effort to develop the priorities had been more inclusive in the early stages. The prioritization within the guidance was established by the United States Environmental Protection Agency (EPA)/State Priorities Workgroup, which consisted of representatives from the Environmental Council of the States (ECOS), National Association of Clean Air Agencies (NACAA), and EPA. Many states do not belong to ECOS or NACAA.

In addition, the guidance should be specific about which priorities apply to State Implementation Plan (SIP)-approved states. States with SIP-approved programs may have their own targets and goals, and it would not be appropriate for such programs to be subject to duplicative or conflicting performance measures.

Thank you again for the opportunity to comment on the NPM Guidance. We hope EPA will take our comments seriously and balance priorities for state, local, and tribal agencies in order to focus limited resources on local environmental priorities. Please contact me at (512) 239-1295 if you have any questions concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Hagle".

Steve Hagle, P.E., Deputy Director
Office of Air