

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Stephanie Bergeron Perdue, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 26, 2018

Mr. Robert Todd
Environmental Protection Agency Region 6 (GPD-S)
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: Docket No. EPA-R06-OAR-2017-0055; FRL-9979-57-Region 6

Dear Mr. Young:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to comment on the United States Environmental Protection Agency's (EPA) proposed approval of the revisions to the Texas state implementation plan (SIP) addressing revised rules for volatile organic compounds (VOC) and the state's reasonably available control technology (RACT) analyses for VOC and nitrogen oxides (NO_x), as published in the *Federal Register* on June 26, 2018.

The TCEQ supports the EPA's approval of the Texas SIP revisions addressing VOC and NO_x RACT for the Houston-Galveston-Brazoria (HGB) moderate nonattainment area for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS). The TCEQ agrees with the EPA's analysis and finding that previous VOC and NO_x RACT determinations made for the HGB area under the one-hour ozone NAAQS and the 1997 eight-hour ozone NAAQS continue to meet RACT for the 2008 eight-hour ozone NAAQS; that the revisions to 30 Texas Administrative Code Chapter 115, Subchapter B, Division 1, Storage of VOC, meet both control techniques guidelines (CTG) and non-CTG major source VOC RACT for storage tanks in the HGB area; and, that the HGB area meets VOC and NO_x RACT for the 2008 eight-hour ozone NAAQS.

If you have questions, please contact Mr. Steve Hagle, P.E., Deputy Director, Office of Air, at 512-239-1295 or steve.hagle@tceq.texas.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stephanie Bergeron Perdue".

Stephanie Bergeron Perdue
Interim Executive Director
Texas Commission on Environmental Quality
cc: Guy Donaldson (Donaldson.guy@epa.gov)