

**Texas Commission on Environmental Quality  
Houston-Galveston-Brazoria (HGB) Eight-Hour Ozone State  
Implementation Plan (SIP) Stakeholder Group Meeting  
Summary**

March 25, 2008, at 6:30 p.m. and March 26, 2008, at 9:30 a.m.

Houston City Hall Annex Building, City Council Chamber, Public Level,  
900 Bagby Street, Houston, Texas 77002

**Moderator:** Bridget C. Bohac, Office of Public Assistance

**Attendees:** Paul Ajibogun, Don L. Alford, Ramon Alvarez, Kelli Angelone, Jed Anderson, Joel Anderson, Judi B., Katrina Bayer, Blake Beall, Max Beauregard, Judy Bigon, Paul Bork, Lola Brown, Greg Broyles, Beatriz Cardona, Geoffrey Castro, David B. Collins, Roy Conn, Bill Cook, Elena Craft, Catarina Cron, Mark Davis, Tara Drissell, Ashley Forbes, Ann Forbis, Jack Forbis, Phyllis Frank, Chock Ganapathy, Andrew Gardner, Ken Gathright, Michael Gough, Bridget Guccione, Lucinda Henrichson, Liz Hendler, Tracy Hester, Marsha Hill, Mona Johnson, Luke Jones, Sharon Jones, Josh Katz, Patsy Kilpatrick, S.C. Kilpatrick, Devin Koele, Sean Landry, Laura LaValle, Robert Levy, Faye Liu, Sonia Lopez, Graciela Lubertino, Thuy Mai, Roger Malcolm, Fred Manhart, Brandt Mannchen, Jess McAngus, Betty McGinnis, LaKisha Seldon McKay, Margaret Mitchell, Susan Moore, Colleen Morris, Paul Morris, Christine Morshedi, Mark Muhich, Paul Newman, Juan Parras, Stephen Pavel, Karl Pepple, Ryan Perna, James Philippi, Steve Poling, Steven Ramsey, George Reiter, Rebecca Rentz, Ben Rhem, Sylvia Rodriguez, Jeff Saitas, Venkert Sambana, Jason Sanders, Paul Sarahan, Terri Seales, Karen Shantz, Vic Sheldon, Christine Smith, Juan C. Soto, Blake Stapper, Jan Stavinoha, Christopher Sterling, Ann Stewart, Matthew Tejada, Tom Tesche, Carl Thiele, Mike Tomerlin, Tony Topping, Matthew Trejogive, Linda Vasse, Lisa White, Shelley Whitworth, James G. Wilkinson, Cynthia Williams, Paulette Wolfson, Julie Woodard, and Russell Wozniak.

The moderator opened the meeting and introduced Susana M. Hildebrand, P.E., Director, Air Quality Division, who presented opening remarks.

**TCEQ Staff Presentations**

[www.tceq.state.tx.us/implementation/air/sip/hgb\\_stakeholder.html](http://www.tceq.state.tx.us/implementation/air/sip/hgb_stakeholder.html)

SIP Update – Kelly Keel, Air Quality Planning Section

Modeling – Dick Karp, Air Modeling and Data Analysis Section

Potential Control Strategies – Lindley Anderson, Air Quality Planning Section

**Summary of Open Discussion**

Stakeholders stated that the TCEQ should strive to achieve the National Ambient Air Quality Standard (NAAQS) as soon as possible and remember that the end goal is healthy air. A stakeholder commented that the agency has the opportunity to save people's lives. Stakeholders stressed that agency staff needs to speak passionately to the commissioners for the citizens. Stakeholders commented that more urgency to area issues is needed

along with quick action or the state will be asking for another 20-year extension. Stakeholders expressed disappointment in past SIP submittals.

### *Control Measures*

A stakeholder commented that the agency should consider a broad range of fair and realistic measures across sectors, use technology-based over behavioral-based measures, and take a multiple-pollutants approach. A stakeholder commented that there needs to be combined individual, government, and business responsibility. A stakeholder suggested a four-prong approach (industry, transportation, agriculture, and landscaping). A stakeholder stated that there is no danger of over-controlling ozone precursors.

A stakeholder commented that the agency raise the threshold of cost-effectiveness when determining what control measures to pursue; include a comprehensive rule-effectiveness analysis in the control measure analysis; ensure that each control measure is clearly explained; and provide a clear explanation for any eliminated control measures. A stakeholder also suggested that control measures should have a cost-effectiveness of at least \$10,000/ton of ozone precursor controlled.

A stakeholder expressed concern about emissions from coker units and suggested that the agency should consider controlling emissions from cokers. TCEQ staff responded that one current form of control for coker emissions is by permit. TCEQ staff also mentioned that a report on a Differential Absorption Lidar (DIAL) study, which examined coker emissions, will be released later in 2008.

Some comments stakeholders made related to stationary source control strategies include, but were not limited to: implementing interim control measures now, considering volatile organic compound (VOC) and nitrogen oxides (NO<sub>x</sub>) emissions as a statewide problem; considering flare minimization plans; using a lower destruction efficiency to calculate flare emissions; requiring additional 10% NO<sub>x</sub> reductions from point sources included in the Mass Emissions Cap and Trade (MECT) Program; and requiring a comparative quantitative and qualitative analysis for cap and trade versus source-by-source emission limitations (equal to best available control technology and lowest achievable emissions rate) control measures.

A stakeholder commented that Texas needs strong incentives for clean energy and should look into solar technological solutions.

Stakeholders requested that the agency consider the Phase II of the California Low-Emission Vehicle (Cal LEV II) Program. A stakeholder stated that Cal LEV II has been proposed in the last two legislative sessions. The stakeholder asked if it had to go through the legislature and if TCEQ supported the program. TCEQ staff responded that Cal LEV II requirements would need to be approved by the legislature. Agency staff can only supply data to the legislature and are statutorily prohibited from lobbying the legislators on any issue. One of the concerns about pursuing the Cal LEV II Program is that as more time passes, less benefit will be realized because the federal controls will be

phased in. In 2012-2013, the benefit from the strategy is estimated to be 1.3 tons per day of NO<sub>x</sub> reductions. By 2018, the benefit is reduced to only 0.11 tons per day.

A stakeholder questioned how the TCEQ will work with local groups. TCEQ staff responded that TCEQ has a contract with Houston-Galveston Area Council to look at local control strategies for mobile sources. There will be more conversations with local agencies on how local measures can be incorporated into the SIP.

A stakeholder expressed concern that the Port of Houston projects could cause increases in emissions. The staff responded that the Federal Clean Air Act requires states to look at what additional reductions are being made to offset new emissions.

A stakeholder commented that plug-in cars are clean, good for the economy, and will work for 98% of commuters. The stakeholder suggested providing incentives such as free metered parking, free toll lanes, and secondary benefits such as free vehicle inspections. TCEQ staff noted that the AirCheck Texas Program provides incentives to encourage people to trade in older more polluting vehicles for cleaner vehicles.

Some additional mobile source control strategies that stakeholders suggested include, but were not limited to: increasing the volume and reliability of public transportation, reducing idling, and increasing urban density.

### *Monitoring*

Stakeholders stated that more monitoring for ozone precursors is needed. Some suggestions included increased fence-line monitoring, Continuous Emission Monitoring Systems (CEMS), and Fourier Transform Infrared (FTIR) monitoring.

Stakeholders commented that there is no monitor in Fort Bend County and one is needed. Stakeholders asked if there were any plans to increase the number of ambient ozone monitors in the state. A stakeholder commented that the University of Texas is planning on placing a monitor at the University of Texas–Sugarland.

A stakeholder requested information on where the monitors are located. TCEQ staff agreed to forward the web address where this information can be obtained to the stakeholder. Stakeholders also expressed the need for quicker ozone warnings and more thorough monitoring.

A stakeholder lauded new grid definitions and asked about the development of monitoring under the 1 kilometer scale. TCEQ staff responded that the finest resolution for the modeling emissions is the 2 kilometer grid and the finest resolution for meteorological modeling is the 4 kilometer grid. The stakeholder responded that Alpine Geophysics is modeling at 1 kilometer scale.

Stakeholders also commented that the agency needs to be proactive by modeling for the new ozone NAAQS and by collecting more information from industry.

### *Public Education/Outreach/Incentives*

A stakeholder commented that more public education is needed and that people would make better choices if they had more information. Other suggestions were to expand the AirCheck Texas Program to include small businesses, to initiate landscaping outreach programs, and to encourage a study of plug-in cars.

Follow up note: Based on the need for public outreach and education, TCEQ staff is recommending holding another stakeholder meeting focused on public education.

### *Process Changes*

Stakeholders suggested that the SIP planning process be revised to make it more efficient.

A stakeholder suggested that the agency change its process for evaluating alternative control technologies and not wait for U.S. Environmental Protection Agency (EPA) approval.

### *Miscellaneous*

Stakeholders commented on the health effects of ozone. The stakeholder stated that ozone is associated with cardiac events and that every 10 parts per billion of ozone increases mortality 0.5 percent, which is thousands of deaths.

A stakeholder asked which contractors and other entities provide information for the SIP to the agency. TCEQ staff agreed to forward this information to the stakeholder.

Stakeholders asked what efforts the agency will take to achieve the new ozone NAAQS and suggested that the agency plan now and not wait. The staff responded that agency staff is in the process of assessing what areas across the state will be impacted by the new ozone standard.

A stakeholder commented that global warming issues need to be acknowledged.

A stakeholder commented that enforcement fines are too low.

Stakeholders stated that the one-hour ozone NAAQS should be retained.

Two CDs containing documentation of Houston Air Quality Conditions by National and Local News Media and Senate Hearings on EPA Denial of California Emissions Waiver were provided to TCEQ staff. The book, *Houston. It's Worth It* was also given to TCEQ staff.

### *Conclusion*

The moderator reminded the stakeholders that the information for submitting comments was in the presentation handout and thanked everyone for their time and efforts.