Texas Commission on Environmental Quality
Houston-Galveston-Brazoria (HGB) Eight-Hour Ozone State Implementation Plan
Control Strategy Development Update

On-Going Rule Projects

- VOC Control Techniques Guidelines Update (Groups II, III, and IV)
  Rule Project 2008-019-115-EN
  - Stakeholder process anticipated in early December 2008
  - Tentative schedule for rulemaking: Proposal June 2009
    Adoption November 2009

Studies and Surveys

- Cost Analysis of HRVOC Controls on Polymer Plants and Flares (ENVIRON) - Final report to be posted on the HRVOC Stakeholder Webpage.
- Possible upcoming studies:
  - Follow-up HRVOC cost analysis study focusing on non-polymer facilities.
  - Study to evaluate portable engine registration programs in other states.
- Surveys
  - Oil and Gas Survey of Compressor Engines and Dehydrators for Angelina, Austin, Hardin, Houston, Jasper, Jefferson, Newton, Polk, Sabine, San Augustine, San Jacinto, Trinity, Tyler, and Walker Counties.
    - Contact: Martha Maldonado - Emissions Assessment Section

Control Strategy Concepts Evaluation

- Staff is evaluating the possible measures provided in the draft initial concept list and those suggested by stakeholders.
- Some measures staff is no longer evaluating:
  - *Chlorine emissions strategies*. Based on current information, chlorine emission reductions will not advance attainment and anthropogenic sources may be greatly overshadowed by chlorine from the Gulf of Mexico.
  - *VOC control strategies outside the HGB nonattainment area*. Preliminary modeling indicates VOC reductions outside HGB will not advance attainment of the HGB ozone nonattainment area.
  - Control strategies that the TCEQ does not have the authority to implement or are otherwise contrary to state and/or federal law. Examples:
    - *More stringent emission limits on natural gas-fired residential water heaters*. Senate Bill 1665 (80th Texas Legislature) prohibits residential water heater emission limits more stringent than the current limit, unless set by federal rule.
    - *Revise building codes to require energy efficient design and material*. TCEQ has no authority to mandate building codes.
    - *Ban new development that results in any increase in air pollutants*. The FCAA and Texas law do not allow the TCEQ to deny a permit based solely on the source being new.