

Summary of Comments Received on Clinton Drive, Harris County Designation Recommendation for Fine Particulate Matter

November 24, 2009

General

The Houston-Galveston Area Council's (H-GAC) Transportation Policy Council supported the Texas Commission on Environmental Quality's (TCEQ) recommendation to remain attainment for the 1997 annual National Ambient Air Quality Standard for fine particulate matter (PM_{2.5}). H-GAC, the TCEQ, and other state and local agencies along with local businesses have been working to reduce the concentration of PM_{2.5} in the Clinton Drive area. Voluntary efforts to reduce PM_{2.5} in the community included paving, spraying of dust suppressants, and fuel switching to low sulfur fuels. H-GAC is also committed to spending approximately \$5 million in federal stimulus funds to continue improvements in the area to reduce PM_{2.5} through paving, drainage improvements, and landscaping. PM_{2.5} reduction projects are scheduled for completion in 2010 and 2011.

Galena Park Councilmember R.C. Clowers asked about installing an additional monitor inside Galena Park city boundaries, which monitors all criteria pollutants and volatile organic compounds. He is concerned about PM_{2.5} as well as other air contaminants impacting community health.

Harris County Public Health and Environmental Services (HCPHES) commented that it appreciated the work done by the TCEQ and community partners to reduce PM_{2.5} at the Clinton Drive monitor. Additionally, HCPHES suggested that the TCEQ be proactive and reduce PM_{2.5} source permits in preparation of a more strict future PM_{2.5} standard.

The Sierra Club's Lone Star Chapter and the Houston Regional Group made four comments as follows.

- 1) The Sierra Club urged the TCEQ to be proactive and take the opportunity to go below the current 15 micrograms per cubic meter 2006 annual PM_{2.5} standard, as the standard was expected to go down in the next five year evaluation in 2011.
- 2) The Sierra Club supported the resurfacing of Clinton Drive and encouraged all the partners to push for totally restructuring of the road as Clinton is an important artery of the port.
- 3) The Sierra Club was concerned with the TCEQ's suggestion at the November 19, 2009 meeting that 10 micrograms per cubic meter was close to background and might be difficult to achieve if the PM_{2.5} standard became tighter.
- 4) The Sierra Club suggested more strict enforcement of the Chapter 111 dust control rules, specifically §111.143 on materials handling; §111.145 on construction and demolition; §111.147 for roads and alleys; and §111.149 for parking lots. If needed, the TCEQ should update the rules to ensure effective PM reductions.

The Hyco company claimed its equipment could reduce bus emissions to zero for public transit. Hyco has worked with the Brazos Transit District for a project in The Woodlands to provide zero emission fuel cell buses and a renewable energy-produced hydrogen fueling station, and it could do the same for Houston. Hyco would be glad to answer any questions about their program.

One individual requested the Starfield letter from United States Environmental Protection Agency (EPA) and attachments. The Jackson letter from the EPA was available on the TCEQ Web site.

The NOVUS Wood Group commented that it seemed illogical to allow the open burning of land-cleared material and woody debris in Texas nonattainment areas when particulate matter (PM) levels have been exceeded partly by open-burning in adjacent countries in which Texas has no jurisdiction. If Texas wants to reduce PM levels in both attainment and nonattainment areas, the company suggests eliminating opening burning of agricultural and woody debris in nonattainment areas. Non-burning options would be better for the environment like reusing, recycling, composting, mulching, etc.