



Air Pollutant Watch List Public Comment Form

Date received: March 2, 2009

APWL Site Under Consideration

County: Jefferson

Cities: Beaumont, Port Arthur and Port Neches

TCEQ Region: 10 (Beaumont)

APWL Site Number (for existing sites): APWL 1002, APWL 1003, APWL 1004

Pollutant(s): Hydrogen sulfide, benzene and 1,3-butadiene

Comment(s):

The Southeast Texas Plant Managers Forum wishes to contribute comment to the proposed action by the Texas Commission on Environmental Quality to remove hydrogen sulfide from the Beaumont Air Pollution Watch List and butadiene from the Port Neches Air Pollution Watch List.

The Southeast Texas Plant Managers Forum is an organization of the 50 heavy industrial facilities in Southeast Texas, specifically Jefferson, Orange and Hardin Counties, and has for many years now installed, sponsored and supported the South East Texas Regional Planning Commission Air Monitoring System, Texas' original run-time industrial sponsored air quality monitoring system.

The Forum maintains a committee devoted to improving environmental quality and compliance, particularly air quality. I chair its Environmental Committee. I am the manager of ExxonMobil's Beaumont PE plant. The Forum firmly believes that a proactive effort to improve our community's environment is an important mission of area industry.

The Forum supports the proposal by the Texas Commission on Environmental Quality to remove hydrogen sulfide from the Beaumont Air Pollution Watch List and butadiene from the Port Neches Air Pollution Watch List. In addition to the evidence of improvement in air quality cited by in the TCEQ proposal, Forum surveys of emissions from industrial sources operating in Jefferson, Hardin and Orange Counties show a 45% decrease in VOC emissions and a 38% drop in SO₂ emissions over the last ten years. Likewise, ambient ozone levels have decreased dramatically over the same period and the Beaumont-Port Arthur-Orange region has now reached attainment of the 1997 Federal ozone standard.

There is strong evidence, in fact, that benzene and sulfur dioxide should also be removed from the Beaumont Air Pollution Watch List and benzene from the Port Arthur Air Pollution Watch List. In both cases the regulatory preconditions for removal have been

complied with few or solitary exceedances which are explainable and are not representative of the trend based on data collected by our area air monitoring specialists. As you go forward with the proposed actions, please consider whether additional removals are justified for the Southeast Texas area based on this additional data.

In connection with the proposed re-designation of Southeast Texas as an ozone attainment area, removal of these items from the Air Pollution Watch List clearly evidences the commitment of industry in our community to environmental quality.

Please do not hesitate to contact us for additional information with respect to the additional watch list issues.



Response to APWL Comment Submitted by The Southeast Texas Plant Managers Forum

Date: March 13, 2009

APWL Site Under Consideration

County: Jefferson

Cities: Beaumont, Port Arthur and Port Neches

TCEQ Region: 10

APWL Site Number (for existing sites): APWL 1002, APWL 1003, APWL 1004

Pollutant(s): Hydrogen sulfide, benzene and 1,3-butadiene

- 1) **Comment:** ...There is strong evidence, in fact, that (a) benzene and (b) sulfur dioxide should also be removed from the Beaumont Air Pollution Watch List and (c) benzene from the Port Arthur Air Pollution Watch List. In both cases the regulatory preconditions for removal have been complied with few or solitary exceedances which are explainable and are not representative of the trend based on data collected by our area air monitoring specialists. As you go forward with the proposed actions, please consider whether additional removals are justified for the Southeast Texas area based on this additional data.

Response (a): benzene... should also be removed from the Beaumont Air Pollution Watch List: Benzene was placed on this APWL due to high readings at the former CAMS 54 Carroll St. Park air monitoring site. The annual average benzene concentrations at this site have remained below our health-based screening level of 1.4 ppb_v for the past four years. Thus, in the near future, we will be proposing that this pollutant should be removed from the APWL. However, this monitor is in the process of being relocated to a nearby residential area and the TCEQ is looking forward to evaluating data from this new location. Historically, the TCEQ has focused monitoring resources in this area and will continue focusing our resources here.

Response (b): ...sulfur dioxide should also be removed from the Beaumont Air Pollution Watch List: Also included in your comments was a recommendation to remove sulfur dioxide from APWL1002 in Beaumont. However, our most recent mobile monitoring trip in 2007 reported levels above TCEQ's regulatory standard. Also, TCEQ has performed multiple mobile monitoring trips in the area since 2003 and have repeatedly monitored off-

property exceedances of TCEQ's regulatory standard. Thus, we will continue to support all efforts to reduce sulfur dioxide emissions in this APWL area of concern.

Response (c): ...benzene from the Port Arthur Air Pollution Watch List:

After careful consideration, we have decided this location will remain on the APWL for the following reasons:

- 2008 monitoring data reported an annual average benzene concentration at the City Service Center is 1.91 ppb_v, which is above our annual screening value of 1.4 ppb_v.
- Benzene levels at this monitor have increase substantially since 2007. The current average of 1.91 ppb_v is 2.7 times higher than the annual average benzene level observed in 2007 (0.7 ppb_v) which is consistent with the upward trend in benzene concentrations measured during 2008.

When considering the removal of benzene from an APWL area, our primary criteria is that reported concentrations are indicating a downward trend over time. Currently, available data suggest an upward trend, thus we will continue to encourage efforts to reduce benzene levels near the City Service Center monitor.