



January 16, 2024

**VIA THE TCEQ PUBLIC COMMENT SYSTEM**

Denine Calvin  
MC 206  
State Implementation Plan Team  
Air Quality Division, TCEQ  
P.O. Box 13087  
Austin, TX-78711-3087

Laurie Gharis  
Chief Clerk, MC 105  
TCEQ  
P.O. Box 13087  
Austin, TX 78711-3087

**RE: Public Comments regarding Houston-Galveston-Brazoria (HGB) Severe Area Attainment Demonstration (AD) State Implementation Plan (SIP) Revision for the 2008 Eight-Hour Ozone National Ambient Air Quality Standards (NAAQS), Docket No. 2023-1223-SIP/Project No. 2023-110-SIP-NR**

Dear Chief Clerk and Air Quality State Implementation Plan Team,

Sierra Club submits the attached comments of members and supporters on the Texas Commission of Environmental Quality's ("TCEQ's") proposed attainment demonstration state implementation plan for the Houston-Galveston-Brazoria ("HGB") nonattainment area under the 2008 national ambient air quality standard for ozone. Sierra Club members and supporters live, work, recreate, own businesses, and breathe the air in the HGB nonattainment area and are directly and adversely affected by ground-level smog. As the attached comments make clear, Texas's persistent and decades-long nonattainment crisis has real-world, everyday impacts on families, businesses, and tourism.

*/s/Joshua Smith*  
Staff Attorney  
Sierra Club  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
[joshua.smith@sierraclub.org](mailto:joshua.smith@sierraclub.org)  
(415) 977-5560

Re: Houston-Glaveston-Brazoria Comments on Docket No. 2023-110-SIP-NR

To Whom it May Concern:

I urge TCEQ to implement the most stringent possible plan to bring the Houston-Galveston-Brazoria nonattainment area back into attainment for ozone pollution in accordance with the 2008 National Ambient Air Quality Standards and as is required by the Clean Air Act. In the HGB area, a group of large industrial plants – including the WA Parish coal plant, oil refineries, and chemical and petrochemical plants – are the biggest ozone-precursor sources and need to reduce both VOCs and NOx emissions. NRG's Parish coal plant in Fort Bend County is by far the No. 1 source of NOx pollution. ExxonMobil's Baytown complex of the oil refinery and chemical and petrochemical plants is the largest source of VOC pollution. A 2023 ozone report published by the Environmental Integrity Project identified six Houston areas where residents were exposed to the highest levels of ozone in 2023 at 100 ppb (the 2008 standard is 75 ppb). It is also explained that more than 90 percent of the residents in four of these areas are people of color, and that about 50 percent of these households are low income. Overall, their data shows that people of color and low income households in Houston are more likely to be exposed to ozone concentrations that are higher than the federal standard and the least likely to have been improved since these standards were set in 2008 (1). A large part of the nonattainment problem in Texas is related to increased temperatures, because the summers are getting hotter as the climate crisis is exacerbated by continued reliance on fossil fuels and a failure to appropriately regulate polluting industries in general. A recent story from the Sierra Club identified that nearly half of the Texas population is consistently exposed to unsafe levels of ozone pollution (2). That's nearly 15 million people who could be at risk. This is a public health crisis that TCEQ must address before it worsens. Additionally, a serious concern that I have regarding TCEQ's plan pertains to tailpipe testing fraud and TCEQ's vehicle I/M program. There have been reports that fraudulent inspectors can use a simulator device similar to a flash drive that plugs into the emissions analyzer instead of the car. The device simulates a car's onboard diagnostic system and can be programmed to guarantee a passing result (3). Texas investigators believe millions of cars on Texas roads never actually passed state-required safety or emissions tests. Yet, those cars were able to get temporary paper license plates, or even regular metal plates, by paying an inspection station to fraudulently pass the car. Even more concerning is the fact that these reports found the state's inspection computer system is not programmed to catch fake inspections and immediately stop them. TCEQ needs to work more closely with local law enforcement agencies and the Texas Department of Public Safety to stop fraudulent tail pipe inspections. Texans are facing the very real and dangerous consequences of TCEQ's failure to submit state plans that meet the federal requirements for NAAQS, so we expect you all to do your due diligence and provide the most stringent regulations with these revisions to the 2008 plan.

Thank you for your consideration.

1. <https://subscriber.politicopro.com/eenews/f/eenews/?id=0000018c-17ba-dbbc-a1de-7ffedcd10000>

2. <https://www.sierraclub.org/texas/blog/2023/11/more-half-texans-live-areas-unsafe-ozone-levels-which-rise-temperatures>

3. <https://www.nbcdfw.com/investigations/fake-inspections-real-license-plates-investigators-believe-millions-of-texas-cars-were-never-checked-for-safety-emissions/3220698/>

1. Jere Douglas  
Houston, TX 77083

2. Jeffrey Weaver

Houston, TX 77043

. Y children a d grandchildren would appreciate a better quality of air than what we're experiencing today. Thank you.

3. Elizabeth Kelch

GreenCoveSprings, FL 32043

Texans need the TCEQ to better regulate Ozone pollution!

4. Art Hanson

Lansing, MI 48917

However, you MUST do MUCH MORE. We MUST keep ALL Climate-Changing fossil fuels IN THE GROUND! We MUST achieve 100% Clean, Renewable Energy like Solar and Wind in electrical generation and transportation by 2030.

5. Lili Flores

Houston, TX 77089

We need to take care of nature and that includes us humans. We need to breathe better quality air to prevent more sicknesses. Our best decisions make a better world to live in.

6. DARRELL NEINAST

Seguin, TX 78155

7. Shana Breeden

Houston, TX 77021

I am tired of Houston having terrible air quality days where I can?t even go outside when the weather is nice. Address the pollution problem in Texas now!!

8. Lisa Stone

Houston, TX 77096

You decide what's more important: overall human health or a few individuals' increased profit.

9. Lorraine Stehn

McAllen, TX 78504

I am an MDAnderson cancer patient and have to be treated in Houston monthly. I notice the reduced air quality with each visit I develop a sore throat.

10. David Mulcihy

Nassau Bay, TX 77058

I get tired of not being able to breathe.

11. Matt Helton

Woodway, TX 76712

My life's goal is to leave a cleaner, healthier world for my children. Regulating and reducing smog in population dense areas is a critical step in that work. Texans everywhere deserve clean air.

12. Brant Kotch  
Houston, TX 77024

13. Sherry Stover-Volker  
Eastampton Township, NJ 08060

14. irene Williams  
DIME BOX, TX 77853  
Please do something about the atrocities that have been placed upon this beautiful planet. The air is horribly disturbing in texas

15. Sharon Towsley  
Chicamauga, GA 30707  
Time to fix the ozone problem before bigger problems of bad health for everyone. This land is beautiful keep it that way.

16. J Cuci  
Orland Park, IL 60467  
STOP THE PSYCHOPATHIC TREATMENT OF OUR ENVIRONMENT!

17. Alyssa Clemenzi  
Boulder, CO 80305

18. Mona Lonergan  
RichmondI, VA 23229  
I have friends living in Houston along with their children and grandchildren. Please help these highly educated people 3 of whom are in the health care industry, that you will take their pulmonary health seriously.

19. Joan E Maccari  
Madison, NJ 07940

20. Ann Hanna  
LUMBERTON, NC 28360  
Please ensure that the 2008 air quality standard requirements are being upheld by the clean air act in Texas, this effects us all and we are tired of big corporations being able to pay to get standards undone removed or paying enough to simply gave thrm ignored

21. H. Dennis Shumaker  
Cornwall, PA 17016

22. Kim Ward

Houston, TX 77008

This matters for future generations to live a healthy life. With all the refineries aging and failing it's more important than ever. Also government deregulation hasn't helped.

23. Erin Foret

Martinez, CA 94553

24. Cardin Tran

Houston, TX 77086

I haven't experienced enough of the effects of air pollution to warrant that we need immediate and broad changes to how we handle air quality management, but I'd say that the air quality is definitely not near ideal and that we need to start making small adjustments within the next 2 years that target the improvement of air quality.

25. Jean Chagnon

New York, NY 10001

urgency

26. Karen Trearchis

Dracut, MA 01826

27. Mary Ruiz

Houston AWESOME, TX 77034

Regulations on industrial pollution must be implemented in order to improve air and environmental quality for the health of our citizens.

28. Maria Coleman

Tempe, AZ 85282

Contact me right away

29. Jim Dailey

Woburn, MA 01801

30. Richard Woodward

Houston, TX 77095

Enforcement of noncompliance issues in the Tri-County area by TCEQ is a joke. How can the agency regain public confidence and trust? One. Strong publication of frequent excursion monitoring to raise public awareness of the polluted air. We all share. Two. Strong action plans to regulate polluters on high excursion days. Let's see limitations on transport, restrictions on refining activity and flaring, reduction in major cold, burning polluting industries like power generation. Three. Recent large scale chemical fires in the Tri-County area have made TCEQ look ridiculous. When they wave an air monitor saying the air is safe to breathe, and there are huge

columns of particulates, VOCs and combustion products ballooning from the fire. Let's see some reporting of what's in that smoke, what do you exposure is downwind and prognosis for eventual impact. Let's see some honesty and transparency in air monitoring.

31. Alicea Townsend  
HOUSTON, TX 77059

I live in Houston near NASA and for the last few years the plants have been releasing more dangerous chemicals every year. You can ask anyone in the Clear Lake, League City, South Houston, Pasadena or even Galveston, it is getting worse and causing health problems for many of us. I understand that many of you see no other way other than this way but it does come at a cost to the quality of our lives. These plants do it early in the morning or very late in the evening to avoid being caught. Enforce, put harsher penalties, and fund the departments that regulate these issues.

32. Jason Matsumoto  
Galveston, TX 77551

Come on. We have to get our act together as a state and country to lessen the pain we will experience from climate change. These rules are a drop in the bucket.

33. Earl Poteet  
Pueblo West, CO 81007

34. Ed Perry  
New Braunfels, TX 78132  
We all need clean air and it is our right.

35. Lynds Pickett  
Lakewood, CO 80232

36. gisela zech  
boise, ID 83706

37. Sam Godwin  
Salt Lake City, UT 84105

38. Cathryne Kimura  
Aurora, CO 80013

39. Brenda Crazy Bull  
Kuna, ID 83634

40. Teresa Phillips  
Fort Collins, CO 80525

41. Heather Vasquez  
Denver, CO 80238

42. Gayla Smith  
Mesquite, TX 75181

43. Gai Lawsen  
Durango, CO 81301  
Climate engineering, aerosols, kill ozone!

44. Cameron McElroy  
Richland, WA 99352

45. Diane Danby  
Longmont, CO 8054

46. Teresa Phillips  
Fort Collins, CO 80525

47. tom stiles  
snowmass vlg, CO 81615

48. Michael Vecchio  
Houston, TX 77025

I strongly support measures that will reduce annual air pollutant loading in the Houston area. They should be modified to become more stringent as population grows yo level and eventually reduce annual loading rates.

49. Donna Rhodes  
Boulder, CO 80301

50. Jax Sprague  
Seattle, WA 98101

51. Sherrilyn Drew  
Des Plaines, IL 60016

52. Keely Chow  
Bellaire, TX 77401

53. Sandy Schott  
Kalispell, MT 59901

ATTENTION: We need better regulation of ozone pollution so that we can breathe cleaner air? Right now the SIP ? or State Implementation Plan ? revisions are underway. Cities like Houston,

Galveston, and Brazoria, named the worst-offending areas for severe air pollution, need to make updates to these plans created by states to meet air quality standards. These revisions are often needed due to the changing conditions of our environment and the need to find more efficient ways to control emissions and monitor air quality to protect public health.

54. Alida Bockino  
Moscow, ID 83843

55. Karen Kenia  
Factoryville, PA 18419

56. Kimberley Usher-Duve  
Bedias, TX 77831

57. Emily Boone  
Louisville, KY 40206

58. Stephen Nutt  
Arlington/Dallas, TX 76015

59. Richard Vultaggio  
Vestal, NY 13850

60. Susan Pitiger  
Vashon, WA 98070

61. Barbara Smith  
Memphis, TN 38111

62. David Klingensmith  
Eugene, OR 97401

63. Pam Harper-Smith  
College Station, TX 77840

64. Caroline Mead  
Glenview, IL 60025

65. John Jumonville  
San Antonio TX, TX 78247

66. Valarie Matinjussi  
Bellingham, WA 98225



67. Darryl Warner

far rockaway, NY 11693

we need to protect the ozone;it is a life force for all humanity and nature.

68. Stephanie Stallings

Houston, TX 77077

In summer 2023, there were ozone action days during daytime hours almost continuously. I had to delay my evening walks to avoid harm from ozone. At times, ozone action days even extended past sunset. There have been times I felt an itch in my eyes and throat on evening walks, and I believe it may have been ozone or other air pollution. Summer 2023 also had heat advisory/heat wave warnings on most days, and even until September. I've read that 2023 was the hottest year yet, breaking or tying with multiple records. I worry I may have to leave Houston sometime in the next 10 years for my own safety to avoid heat stroke: after all, heat waves are the deadliest natural disaster.

69. Ric Watkins

Phoenix, AZ 85033

I lived and worked in Texas for many years. Life there has deteriorated due to corrupt political and government policies designed to keep offensive people in power. I am glad I was able to move out of the state.

70. Monique Hahn

Gates Mills, OH 44040

71. Carol Schmidt

Sidney, OH 45365

72. Kathleen Herrera

Edgewater, CO 80214

Help people

73. Linda Fielder

Carrollton, TX 75006

It's time the TCEQ actually DID something to protect the health of Texans. Stop allowing polluters to pollute our air, land

74. Ricki Gardner

Sachse, TX 75048

Please stop polluting our air!

75. Marilyn Mooshie

Selma, OR 97538

76. Sandra Donahue

North Andover, MA 01845

77. Robert Clark  
W. Covina, CA 91791

78. Connie Kendall  
Springfield, OH 45503

79. Erh-Yen To  
Sacramento, CA 95835

80. Jerry Tobe  
Los Angeles, CA 90034

May you do ONLY that which is truly best for the vast majority of people living in Texas and cause those people as little harm as humanly possible. Thank you for your consideration.

81. Paul Clinch  
Oak Brook, IL 60523

82. Jean Cameron  
Gainesville, FL 32606

83. Jean Cameron  
Gainesville, FL 32606

84. Nancy Gathing  
Madison, WI 53714

85. Linda Stock  
I, CA 90630

I grew up in Long Beach, CA, in the 50's, with smog so bad it burned your skin and eyes and lungs. It made holes in my nylons. If it does that to material, what does it do to the cells in our lungs? Don't you want to breathe air that meets air quality standards. Your money doesn't do any good when you are on your deathbed.

86. EILEEN MILLAN  
NY, NY 10011  
please work on this immediately

87. linda kitchen  
Oak Park, IL 60304

88. Terrillyn A. Geer  
Pittsfield, MA 01201

89. Keely Chow  
Bellaire, TX 77401

90. Karen Loeser  
Mercer Island, MS 98040

91. Bonnie Mccann  
Katy, TX 77494

92. Theresa Gerace  
Langhorne, PA 19047

93. Marilyn Shepherd  
Trinidad, CA 95570

94. Robert Kelley  
Conroe, TX 77304

95. Donald Smith  
st Johnsbury, VT 05819

96. Marian McCurdy  
Bulverde, TX 78163

I am a Texan and am not proud of how we are not doing better to curb ozone pollution.

97. Michele Dawn Sanderson  
Walnut Creek, CA 94595

thank you very much for making sure our air is good for our health all over the world including the USA, very important for the health of humanity and the earth in general

98. Susan Lewis  
Evergreen, CO 80439

99. Lisa Perrotta  
Newton, MA 02458

100. Margaret Goodwin  
West Haven ct, CT 06516  
we have to pay attention to ozone

101. Eric Zinn  
Brooklyn, NY 11210

102. Veronica Waller  
Crosby, TX 77532

103. Janice Barker  
Alliance, OH 44601

104. Ruth Zemek  
Phoenix, AZ 85018  
wake up, TEXAS!!

105. Lori Jackson  
Shelbyville, KY 40065  
We need to protect our air. Please help us do this!

106. Diane Langejans  
Irvine, CA 92606  
This issue matters to me because the lack of regulation of ozone pollution from industrial and fossil fuels puts people at greater risk. The increasing of ozone exposure will lead to more severe respiratory problems, hotter summers, and increased greenhouse gases damaging our atmosphere. Pollution has effected me because I have lived through the years when there used to be no protections placed in gasoline. The high concentrations of lead used to make my lungs ache and hurt from being in town of Los Angeles. The pollution from leaded gasoline affected me in an adverse manner. The cities of Houston, Galveston, and Brazoria, need to make updates to their plans created by states, to meet air quality standards that will make pristine and clean air quality standards. The public's health matters. The fact that the TCEQ has failed to submit good state plans to meet federal ozone standards for 15 years is completely unacceptable. The air we breathe matters to our lungs & to our planet.

107. rose moore  
yale, MI 48097

108. George Bannister  
New York, NY 10002

109. Sandra MS Cheng  
Renton, WA 98056

110. David Straka  
Evansville, IN 47720

111. Matthew Miller  
PITTSBURGH, PA 15227

112. Fran Aguirre

Denver, CO 80211

Please pass this legislation. The wind blow ozone from Teas to Colorado. It adds to what is already here!

113. SUSAN TATRO

EUREKA, CA 95503

114. Greg Sells

Austin, TX 78741

115. KERRY KREBILL

CLANCY, MT 59634

116. Benjamin Bingaman

Trabuco Canyon, CA 92679

117. Kayt Wolfe

Marietta, GA 30068

Every state and every country around the world needs to take immediate action to protect the environment. Do your part by addressing the ozone issue.

118. Nancy S Sidebotham

Oakland, CA 94605

119. Ron Gilliland

Herndon, VA 20170

120. Margaret Lauer

Clearwater, FL 33756

121. Bob Love

Little Egg Harbor, NJ 08087

Clean air is needed

122. Darlene Knox

Sisters, OR 97759

123. Mark Lessner

Lake Havasu City, AZ 86403

124. Thomas Gilmore

Bellingham, WA 98225

Texas needs to improve air quality regulations!

125. Craig Rudolph  
NORTH ROYALTON, OH 44133

126. Monica Bayles  
Omaha, NE 68154

127. Margarita Latimer  
Miami Beach, FL 33140

128. Painter Who Touch Isa House Nnnn  
I?m in, CA 93619  
Hi

129. Hedwig Raskob  
Kendall, NY 14476  
Myself wanting to be able to breath, so I want others to breathe and live.

130. Victoria Soli  
Houston, TX 77025

131. Ricardo Amaya  
Houston, TX 77038

132. Jonathan Connor  
Westfield, NJ 07090  
Please tell Texas to regulate their emissions and prevent a global catastrophe.

133. Janeene Porcher  
Golden, CO 80401

134. Jordan Burress  
Bella Vista, AR 72715

135. alicia kautz  
44691, OH 44691

136. Matas Aleksas  
New Fairfield, CT 06812

137. Chrysanthi Lawrence  
Houston, TX 77030  
Houstonians are in desperate need of better air quality!

138. Jennie Rohrer

Houston, TX 77007

139. S. R.  
Bogart, GA 30622

140. Steven Viola  
New York, NY 10011

141. Anna Sergeeva  
Houston., TX 77025

142. Dale Goldstein  
Levittown, NY 11756

143. Robert Stark  
Houston, TX 77062

144. Anthony Carreon  
Antioch, CA 94509  
This is extremely important to me!!!!

145. RICHARD PENA  
San Antonio, TX 78249  
TIME TO STOP THE GOP OZONE POLLUTION IT IS HURTING THE CHILDREN OF THE FUTURE.

146. Dianne Brause  
Satellite Beach, FL 32937

147. Steven Cook  
Seminole, FL 33778

148. Edward Laurson  
Denver, CO 80235  
I'm tired of dirty air, car pollution and chemicals harming our waterways.

149. Marie Herron  
Wildwood Crest, NJ 08260

150. Jon Jarvis  
Las Vegas, NV 89130

151. Chris Calvert  
Santa Fe, NM 87501

152. Jody Mahnken  
Boise, ID 83713

As a person with a respiratory problem, the increase in ozone exposure will lead to more severe respiratory problems and hotter summers unless we take collective action! the increase in ozone exposure will lead to more severe respiratory problems and hotter summers unless we take collective action! The increase in ozone exposure will lead to more severe respiratory problems and hotter summers unless we take collective action!Limit ozone and Restore the breath of life.

153. Patty Navarrete  
Taos, NM 87571

154. Jill Van Cise  
Los Angeles, CA 90057

155. Jill Van Cise  
Los Angeles, CA 90057

156. Jill Van Cise  
Los Angeles, CA 90057

157. Kerry Krebill  
Clancy, MT 59634

158. Dennis Bahr  
Snohomish, WA 98296

159. Janet Swihart  
Long Beach, WA 98631  
Texas needs all the help it can get.

160. Michael Lee  
Peoria, AZ 85383

161. Michael Gan  
Kennewick, WA 99336

162. David Morrison  
Albuquerque, NM 87107

163. Michael Shores  
Tempe, AZ 85281

164. Alice Petersen



Toledo, OH 43623

165. Amy Harrison  
Murrieta, CA 92562

166. Karen Loeser  
Mercer Island, WA 98040

167. linda kitchen  
Oak Park, IL 60304

168. Virginia Simon  
Houston, TX 77063

169. Karen O'Rourke  
Canoga Park, CA 91304

170. Martin Martin  
Brooklyn, NY 11235

171. Rebecca Sanne  
Great Falls, MT 59404

172. M H  
Pittsburgh, PA 15218

173. Claire Buckley  
Portland, OR 76051

As a local Texan, I care deeply about the ability for us to all partake in our natural right to clean air. And if we can do something about the health and safety then that is absolutely what should be done!

174. Cary West  
Burnet, TX 78611

175. fred munger  
littleton, CO 80123  
we need to get active, our future is at stake

176. Ann Rosenwinkel  
Houston, TX 77025

My daughter suffers from asthma and it is exacerbated by the lack of regulations on ozone levels. Please help us all to be able to breathe easy in Texas.

177. Cindy Santi  
Weatherford, TX 76087  
Breath clean air

178. Linda White  
, - 77511

179. Andrew Holdaway  
Houston, TX 77019  
This needs to be addressed by policy makers ASAP.