

# David Pedersen

Dear Texas Commission on Environmental Quality,

Firstly, thank you for updating your commenting form so non-Americans can submit comments as well. Many of your actions don't just affect Americans, so letting everyone have a say is crucial. I apologize if I posed any inconvenience in urging you to update your commenting form to allow non-Americans to weigh in.

As a Canadian clean-air advocate, I am writing to you today to urge you to implement the most stringent possible plan to bring the Houston-Galveston-Brazoria (HGB) airshed back into attainment for ozone/smog in accordance with the 2008 National Ambient Air Quality Standard (NAAQS) for ozone as required by the Clean Air Act.

Ozone is not just harmful at higher concentrations, as the NAAQS falsely implies (Congress knew that any amount of air pollution is harmful when they enacted the NAAQS provisions). It is harmful, even deadly, at ANY concentration above zero; for example, in a 2019 Journal of the American Medical Association (JAMA) study entitled "Association Between Long-term Exposure to Ambient Air Pollution and Change in Quantitatively Assessed Emphysema and Lung Function", researchers found that an increase of just three parts per billion (ppb) over 10 years "is comparable in terms of emphysema progression to smoking a pack of cigarettes a day for 29 years". Ozone is also the cause of the use of the chemical 6PPD in tires and other rubber products, which oxidizes to form 6PPD-quinone (6PPDq) - a chemical that is acutely toxic to marine life and possibly humans as well.

In the HGB airshed, a group of large industrial plants, oil refineries, and chemical and petrochemical plants are the largest ozone-precursor sources and need to reduce both VOCs and NOx emissions in order to improve Houston's air quality. According to permit records, NRG's Parish coal plant in Fort Bend County is by far the number-one source of localized NOx emissions, while ExxonMobil's Baytown complex is the largest sources of VOC emissions.

A large part of the non-attainment problem in Texas is also related to increased temperatures, because the summers are getting hotter as the climate crisis is exasperated by continued reliance on fossil fuels, biomass energy (especially wood burning), and a failure to appropriately and adequately regulate industry in general. A recent story from the Sierra Club found that nearly half of the Texas population is consistently exposed to concentrations of ozone that are considered to be unsafe. That's nearly 15 million people who are at increased risk of harm and premature death. This is a public-health crisis that your agency must address before more innocent people die as a result of inaction.

In addition, a 2023 report published by the Environmental Integrity Project (EIP) identified six areas in Houston where residents were exposed to the highest eight-hour average concentrations of ozone in 2023 at 100 ppb - the threshold at which headaches and other symptoms really begin to manifest (for context, the 2008 standard is 75 ppb, while the latest World Health Organization [WHO] guidelines call for 50 ppb during the off-season and only 30 ppb during the peak season, both averaged over 8 hours). It is also revealed that more than 90 percent of the residents in 4 of

these areas are people of colour, and that about 50 percent of these households are low-income. Overall, their study shows that people of colour 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 the standard was strengthened in 2008.

Texans, and even people elsewhere on Earth, are facing the very real, dangerous, and even deadly consequences of your agency's ongoing failure to submit state plans that meet the federal requirements for NAAQS, so I expect and urge you all to do your due diligence and provide the most stringent regulations with these revisions to the 2008 plan.

Thank you for your time and consideration.

Regards,

David Pedersen

6744 Welch Road, Saanichton,  
British Columbia, Canada V8M 1W6