

David Todd

I am concerned that the ozone SIP revision, as currently envisioned, does not adequately address the impact of fugitive and nonpermitted emissions, from leaking equipment, startups, flares, etc. In particular, I find the estimates of emissions from flares to be inaccurate: I think the assumptions for their combustion/destruction levels to be overly optimistic. I hope that the TCEQ will doubledown on its attention to these important factors. Thanks for considering my views. Best regards, David Todd