

Robert Levy

I urge TCEQ to implement the most stringent possible plan to bring the Houston-Galveston-Brazoria (HGB) area back into attainment for ozone pollution in accordance with the 2008 National Ambient Air Quality Standards as required by the Clean Air Act.

In the HGB area, 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. NRG's Parish coal plant in Fort Bend County is by far the #1 source of NOx pollution locally. ExxonMobil's Baytown complex is the largest source of VOC pollution.

A large part of the nonattainment problem in Texas is also 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 study from the Sierra Club identified that nearly half of the Texas population is consistently exposed to unsafe levels of ozone pollution. That's nearly 15 million people that could be at risk. This is a public health crisis that we need TCEQ to address before it worsens.

In addition, a 2023 report published by the Environmental Integrity Project identified 6 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 revealed that more than 90 percent of the residents in 4 of these areas are people of color, and that about 50 percent of these households are low income. Overall, their study 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.

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.