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 DFW-HGB 2008 Ozone NAAQS Severe RFP SIP Revision, Docket No. 2023-1159-SIP/Project No. 2023-108-SIP-NR

Dear Chief Clerk and Air Quality State Implementation Plan Team,

On behalf of several thousand members and supporters who live, work, and recreate in the greater Houston, Texas region of the state, Air Alliance Houston, Sierra Club, Environment Texas, Public Citizen, Texas Environmental Justice Advocacy Services, and Earthjustice (collectively, "Commenters") hereby submit comments on the proposed Dallas-Fort Worth and Houston-Galveston-Brazoria Severe Areas Reasonable Further Progress (RFP) SIP Revision for the 2008 Eight-Hour Ozone NAAQS ("DFW-HGB RFP SIP Revision"); Docket No. 2023-1159-SIP/Project No. 2023-108-SIP-NR.

To Commenters' dismay and disappointment, the Texas Commission on Environmental Quality's ("TCEQ's") DFW-HGB RFP SIP Revision fails to rationally demonstrate reasonable further progress ("RFP"). It does not require the implementation of controls on large, industrial sources of ozone precursor emissions in order to demonstrate RFP. Instead, TCEQ's DFW-HGB RFP SIP Revision relies primarily on reductions of mobile source ozone precursor emissions in attempting to demonstrate compliance with RFP. For the reasons expounded upon in these comments, TCEQ's plan for demonstrating RFP is unreasonable, irrational, and arbitrary. TCEQ's plan completely ignores that controls on *point and area sources* would have the potential to result in effective, verifiable, and more wide-reaching reductions in ozone precursors. That is, controls on point and area sources are necessary for TCEQ to demonstrate RFP. TCEQ's plan also focuses on modeling emissions reductions from mobile sources—both on road and non-road—to demonstrate RFP while completely ignoring the fact that measured and reported data from point and area sources would be better metrics by which to track RFP.

TCEQ must take more aggressive measures to demonstrate RFP in order to bring this plan in accordance with the law and to protect the health and wellbeing of all people—but

especially those in vulnerable, environmental justice communities—who live in the Dallas/Fort-Worth ("DFW") and Houston/Galveston/Brazoria ("HGB") nonattainment areas.

Because the DFW and HGB nonattainment areas have repeatedly failed to timely attain the 2008 national ambient air quality standard ("NAAQS") for ozone, they are now classified as severe nonattainment areas under that standard. Accordingly, TCEQ has the obligation to demonstrate that it is making RFP toward attainment of that ozone NAAQS, and RFP must "result in VOC emissions reductions from the baseline emissions" equal to either "at least 3 percent of baseline emissions each year" or an amount less than 3 percent if certain conditions are met. 42 U.S.C § 7511a(c)(2)(B). TCEQ derives its inventories of total anthropogenic NOx and VOCs from estimates of emissions from three general categories of sources: point, area, and mobile (both non-road and on-road). To develop an RFP SIP Revision for the 2008 eight-hour ozone NAAQS, TCEQ must:

1. Determine the base year emissions for NOx and VOCs;
2. Calculate RFP target emissions reductions levels based on the RFP percent reduction requirements;
3. Determine the analysis and attainment year inventories according to RFP requirements; and
4. Account for credible emissions reductions in the analysis year and attainment year emission inventories in accordance with applicable requirements.[1]

TCEQ's DFW-HGB RFP SIP Revision does not rationally accomplish the goal of ensuring that RFP emissions reductions will be met and, therefore, it does not comply with the requirements of RFP.

Specifically, the methodologies by which TCEQ plans to account for credible emissions reductions are over-reliant on the modeling of emission increases and decreases for mobile emissions sources, despite the existence of more reliable and verifiable emissions from other sources, namely point sources. It is irrational and unreasonable that TCEQ would not require emissions reductions from sources whose emissions are measured and reported annually to TCEQ, as is the case with stationary point sources in ozone nonattainment areas.

Additionally, TCEQ continues to rely on *mobile source reductions*—as it has done from 2011 to 2020 for RFP[2]—despite ambient levels of both NOx and VOCs correlating more generally with large, *point source* emissions. That is, TCEQ unreasonably and irrationally decides to not require any new controls on point sources (or area sources for that matter), claiming that reductions for mobile sources will suffice for RFP, as it has done for over a decade. However,

[1] Dallas-Fort Worth and Houston-Galveston-Brazoria Severe Areas Reasonable Further Progress (RFP) SIP Revision for the 2008 Eight-Hour Ozone NAAQS ("DFW-HGB RFP SIP") at pg. 2-1.
[2] *See* DFW and HGB 2008 Eight-hour Ozone Serious Classification RFP SIP Revision (Project No. 2019-079-SIP-NR) at pg. 2-17 & tbls. 2-7 to 2-10 (adopted Mar. 4, 2020), available at https://wayback.archive-it.org/414/20210529161935/https://www.tceq.texas.gov/assets/public/implementation/air/sip/dfw/dfw_hgb_serious_rfp_2019/DFW-HGB_seriousRFP_adopkg_web.pdf.

TCEQ identifies no rational reason why this approach will be successful in the future, despite it not being successful through the present day.

TCEQ unreasonably and arbitrarily attempts to demonstrate RFP with modeled reductions in mobile source precursor emissions that are not as reliable as reductions from point sources.

TCEQ takes the position that there is no change in the approach to point source controls from the DFW-HGB RFP SIP Revision (project no. 2019-079-SIP-NR).[3] More broadly, TCEQ states that, for both the DFW and HGB nonattainment areas, *point source NOx* emissions trends have been flat, while *point source VOC* emissions have been declining over the last ten years.[4] TCEQ should, however, reconsider its position that no changes to point sources are necessary for RFP for two principal reasons.

Firstly, the emissions inventories ("EI") that track the incredibly high amounts of these two ozone precursors emitted by industrial point sources into the atmosphere are, quite simply, more reliable than mobile source emissions inventories. TCEQ's reliance on mobile EI is irrational and arbitrary because the emissions reductions are themselves mere projections of projections about the effectiveness of mobile source reductions, which, as discussed below, do not appear to be bearing out. These estimated emissions reductions are ultimately not verifiable. The goals that the DFW-HGB RFP SIP Revision sets for mobile sources are not enforceable. TCEQ inexplicably ignores the possibility of using reported and verifiable data from point source EI to track RFP more accurately. It is unreasonable for TCEQ to attempt to demonstrate its legal obligation towards RFP by focusing its efforts to reduce ozone precursor emissions exclusively on mobile sources. TCEQ should, therefore, take more proactive measures to bring down precursor emissions—rather than passive measures that rely on unenforceable mobile source emissions reductions—by requiring additional controls on point sources.

Secondly, it is not a credible decision for TCEQ to continue to rely on the same strategy that it has employed for over a decade when that strategy has not resulted in decreased ambient levels of either of the ozone precursors. Specifically, TCEQ has been relying on mobile source emissions reductions to make progress from 2011-2020 but the ambient levels of both NOx and VOCs are generally correlating with large point source emissions inventories. TCEQ has not put forth a rational decision or explanation as to why and how the use of this same, failed strategy will yield success in the future.

TCEQ's decision to demonstrate RFP through mobile source emissions reductions rather than point source emissions reductions is irrational because of the difference in the reliability of the two different EI.

HGB Nonattainment Area:

Concerning the HGB nonattainment area, TCEQ states that the top 11 reporting sites accounted for 41% of the total VOC emissions in 2021 and that between 2012 and 2021, VOC

[3] DFW-HGB RFP SIP at pg. 4-8.
[4] *Id*. at pg. 2-5.

emissions from these same sites showed almost no change.[5] If TCEQ were to require additional controls on these top point sources—and other, similar point sources—then the DFW-HGB RFP SIP Revision would have the potential to be *verified* precisely because EI for these types of sources exist and compile data that is reported from actual measurements. Such a plan would also be actively and aggressively pursuing a plan to control VOC emissions from this large category of contributors of this particular precursor. Instead, TCEQ chooses to take a *passive* role regarding these point sources by not requiring any new controls. TCEQ's DFW-HGB RFP SIP Revision declines *entirely* to seek reductions from this category of precursor emissions despite the fact that those reductions could be tracked from real-world collected data as opposed to modeled data. TCEQ's decision is irrational given that point source EI are more reliable than are mobile source EI.[6]

To underscore just how unreasonable TCEQ's plan is, one need only look at the outsized emissions that come from a handful of point sources. TCEQ's Point Source Emissions Inventory shows that the top 10 emitters in the HGB nonattainment area for 2021 emitted anywhere from 654.58 tons per year ("TPY") of VOC (as was the case for the Chevron Phillips Cedar Bayou Plant in Harris County) to 2,202.17 TPY of VOC (as was the case for the Exxon Mobil Baytown Refinery, also in Harris County).[7] In the case of NOx emissions, the top 10 emitters in the HGB nonattainment area emitted from 890.01 TPY (the NRG Texas Power Cedar Bayou Generation Station, in Chambers County) to 5,667.15 TPY (the NRG Texas Power WA Parish Generating Station, in Fort Bend County).[8]

If TCEQ were to require new controls on these—and other large point sources—it would be better placed to independently verify emissions reductions and, therefore, RFP. Instead, TCEQ plans for most of both NOx and VOC reductions to come from non-road mobile sources. This has been true for the 2011 to 2023 time-period[9] but will also be true for the 2011 to 2026 time-period.[10] Specifically, for this latter time-period, of 221.41 TPD in NOx emission reductions that are expected, 205.87 TPD are estimated to be achieved from non-road mobile sources. For VOCs 174.18 TPD of the 183.91 TPD are estimated to come from non-road mobile sources.

It is unreasonable and arbitrary for TCEQ to choose a strategy to demonstrate RFP that is not as reliable as forcing controls on point sources. It is unreasonable and arbitrary for TCEQ to rely almost exclusively on *modeling data* for mobile sources to demonstrate compliance with requirements of RFP for the HGB nonattainment area. Making TCEQ's decision even more

---

[5] Proposed HGB Severe Classification Attainment Demonstration (AD) SIP Revision for the 2008 Eight-Hour Ozone NAAQS (Project No. 2023-110-SIP-NR) ("HGB AD SIP"), Appendix B at pg. 3-16.
[6] TCEQ also provides no rational explanation for its choice to not require the largest point sources that report to the State of Texas Air Reporting System ("STARS") to install new controls, despite this small subset of sources being responsible for an outsized portion of precursor emissions.
[7] *See* Attachment A – Top VOC Point Source Emission Facilities in the Eight County HGB Nonattainment Area and Ten County DFW Nonattainment Area.
[8] *See* Attachment B – Top 10 NOx Point Source Emission Facilities in the Eight County HGB Nonattainment Area and Ten County DFW Nonattainment Area.
[9] DFW-HGB RFP SIP at pgs. 4-4 to 4-5.
[10] *Id*. at pgs. 4-6 to 4-7.

irrational is the fact that it has been relying principally on mobile source reductions to make progress from 2011 to 2020,[11] yet the generally flat ambient levels of both NOx and VOC are generally correlating with large point source EI.[12]

NOx in HGB nonattainment area:

Regarding NOx emissions from area and point sources, it is unreasonable and arbitrary of TCEQ to assume that even with individual increases and/or stagnation in emissions will achieve RFP. The DFW-HGB RFP SIP Revision's plans are based on modeling as opposed to the independently verifiable reductions that are compiled in the point source EI.

VOCs in HGB nonattainment area:

Regarding VOC emissions, there is expected to be an increase in the *total of all sources* of controlled VOC emissions from 469.68 TPD in 2023 to 472.70 in 2026. This is due, in part, to the following: an increase from area sources (311.04 TPD to 317.47 TPD) and a stagnation in VOC from point sources, which will remain at 79.17 TPD.[13] Once again, this exemplifies that the emissions from sources that are actually *verifiable*—with measurements, monitoring, and reporting—will be allowed to increase, while TCEQ instead chooses, irrationally, to demonstrate RFP via modeling of mobile sources.

DFW Nonattainment Area:

The top 10 VOC emitters for the DFW nonattainment area released anywhere from 71.27 TPY (as was the case for the Enlink Midstream Bridgeport Gas Plant in Wise County) to 611.37 TPY (as was the case for the Dartco facility, in Ellis County).[14] Concerning NOx, the top 10 emitters released from 155.81 TPY (Wise County Power Plant in Wise County) to 1,1495.10 TPY (TXI Operation's Midlothian Plant in Ellis County).[15]

TCEQ arbitrarily and unreasonably chooses not to require any new controls on these and other similar point sources. Just like with the largest point sources in the HGB, this is an irrational decision given that reductions to the point source EI are more easily verifiable as they are actually measured and reported. Just as they do in the HGB, they also correlate well with

[11] DFW and HGB 2008 Eight-hour Ozone Serious Classification RFP SIP Revision (Project No. 2019-079-SIP-NR) at 2-17 & tbls. 2-7 to 2-10 (adopted Mar. 4, 2020).
[12] HGB AD SIP at pg. 5-13 (ambient NOx level trend correlates with point source emission level trend), HGB AD SIP at pgs. 5-16 to 5-17 ("Trends from the top 11 VOC sources corroborate ambient VOC trends" and trend of top 9 HRVOC sources "correlates with the ambient HRVOC trends").
[13] DFW-HGB RFP SIP at pgs. 2-19 to 2-20 & tbls. 2-7 to 2-8.
[14] See Attachment A – Top VOC Point Source Emission Facilities in the Eight County HGB Nonattainment Area and Ten County DFW Nonattainment Area.
[15] See Attachment B – Top 10 NOx Point Source Emission Facilities in the Eight County HGB Nonattainment Area and Ten County DFW Nonattainment Area.

ambient VOC trends.[16] Shy of any such amendment, it is doubtful that TCEQ'S DFW-HGB RFP SIP Revision will be able to demonstrate compliance with the RFP requirements.

It is unreasonable and arbitrary for TCEQ to choose a strategy to demonstrate RFP that is based on modeling of mobile sources EI rather than the more reliable point source EI.

NOx in DFW nonattainment area:

TCEQ states that point source NOx emissions trends have been flat for the DFW attainment area over the past ten years.[17] Although this may be true, TCEQ should not remain satisfied with this trend. Instead, TCEQ should take proactive measures to ensure decreases in NOx emissions *recommence*, rather than remain stagnant, in order to bring the DFW into ozone attainment. Such reductions could actually be *verified* through the point source EI as opposed to being *estimated* from mobile source NOx emissions reductions.

Further, the DFW-HGB RFP SIP Revision's plans are based on modeling that has not been verified by similar ambient reductions in precursor levels.[18] TCEQ does not provide any rational explanation anywhere in the DFW-HGB RFP SIP Revision that this modeling's estimations will perform better in the future. Consequently, it is not reasonable for TCEQ to claim that the needed emissions reductions can be achieved.

VOCs in DFW nonattainment area:

Regarding VOC emissions, TCEQ takes the position that VOC emission trends have been declining in the DFW attainment area over the past ten years.[19] However, controlled VOC emissions from non-road mobile sources will increase from 49.81 TPD in the 2023 analysis year to 51.56 TPD in the 2026 attainment year, according to TCEQ's own estimates.[20] Just as Commenters mentioned previously, the DFW-HGB RFP SIP Revision is premised on reducing emissions from mobile sources. Yet in this instance, TCEQ's models estimate that this particular source will increase VOC emissions. Because decreases of mobile sources are key to TCEQ's RFP strategy, its choice to not change its approach to such sources[21] is irrational, arbitrary, and capricious. TCEQ should be doing more. This is acutely demonstrated by the increase in this type of emission that is estimated to take place.

---

[16] *See* DFW 2008 Ozone NAAQS Severe AD SIP Revision (Project No. 2023-107-SIP-NR) ("DFW AD") at pgs. 5-14 to 5-15 (trend of top 6 VOC source emissions "correlates with ambient VOC trends for the DFW 2008 ozone NAAQS nonattainment area").
[17] DFW-HGB RFP SIP at pg. 2-5.
[18] The status of NOx in DFW is difficult to pin down. New near-road monitors came into operation partway between 2012-2022, making it more challenging to truly understand the situation in the area and how it may be changing. *See* DFW AD at pg. 5-10.
[19] DFW-HGB RFP SIP at pg. 2-5.
[20] *Id*. at pgs. 2-18 to 2-19.
[21] *Id*. at pg. 4-8.

It is unreasonable and arbitrary for TCEQ to not require any new controls for area sources in order to demonstrate RFP.

Like point sources, TCEQ states that there is no change in approach to area source controls for the DFW-HGB RFP SIP (project no. 2019-079-SIP-NR).[22] TCEQ states that all listed area source controls had compliance deadlines prior to 2011 and that they were incorporated into the 2011 RFP base year, meaning that no additional area source controls are required to demonstrate RFP for the proposed revision at hand.[23] TCEQ describes area sources as small scale stationary industrial, commercial, and residential sources that use materials or perform processes that generate emissions. Typical VOC area emissions sources include:

- Oil and gas production sources
- Printing operations
- Industrial coatings
- Degreasing solvents
- House paints
- Gasoline service station underground tank filling and
- Vehicular refueling operations

Examples of typical fuel combustion sources that emit NOx include:

- Oil and gas production sources
- Stationary source fossil fuel combustion at residences and businesses
- Outdoor refuse burning and
- Structure fires[24]

One troubling aspect of the DFW-HGB RFP SIP Revision is that population is one of the more commonly used activity surrogates for area source calculations.[25] TCEQ must ensure that surrogates used in calculating emissions from various activities are apt for the particular activities.

TCEQ unreasonably and irrationally focuses on smaller VOC emissions sources to comply with contingency measures requirements.

TCEQ states that contingency measure reductions would be achieved by reductions from six source categories: degreasers, industrial maintenance coatings, industrial cleaning solvents, emulsified asphalt paving, traffic markings coatings, and industrial adhesives.[26] For the reasons given in the concurrently filed comments on the proposed attainment demonstration for HGB

[22] *Id*.
[23] *Id*.
[24] HGB-DFW RFP SIP at pg. 2-6.
[25] *Id*.
[26] *Id.* at pg. 3-4.

and DFW, those contingency measures are illegal and arbitrary.[27] In brief, TCEQ fails to include NOx-reducing measures, includes one measure that must be implemented presently as RACT, and includes one measure that arbitrarily relaxes standards.

Concurrent approval of 30 T.A.C. Ch. 115 and 117.

As it works on the DFW-HGB RFP SIP Revision, TCEQ is plowing ahead with separate but related rules, including amendments to 30 T.A.C. chapters 115 and 117. The huge record across all these rules makes it particularly challenging for the public to fully assess how changes to one action might affect another. TCEQ's denial of a short extension of the comment period exacerbates this challenge. As it moves through its complex, intertwined rulemaking, TCEQ must ensure that it considers how its action in this rule may need to change to address changes, if any, in related rules.[28]

Conclusion

TCEQ must strengthen the DFW-HGB RFP SIP Revision to address the flaws described above and ensure that both severely polluted areas make the requisite emission reductions. Doing so will both comply with the Clean Air Act and improve the health and wellbeing of residents—especially those overburdened by ozone and ozone-forming air pollution.

Sincerely,

Rodrigo G. Cantú,
TX Bar: 24094581
Earthjustice
845 Texas Ave.,
The Sq. Suite 200
Houston, TX 77002
rcantu@earthjustice.org
281.675.5841

Luke Metzger
Executive Director
Environment Texas
luke@environmenttexas.org

Adrian Shelley
Texas Director
Public Citizen
ashelley@citizen.org

Joshua Smith
Kate Huddleston
Sierra Club
joshua.smith@sierraclub.org
kate.huddleston@sierraclub.org

Jennifer M. Hadayia
Executive Director
Air Alliance Houston
jennifer@airalliancehouston.org

Juan Parras
Anna Parras
Texas Environmental Justice Advocacy Services (t.e.j.a.s.)
parras.juan@gmail.com
ana.parras@yahoo.com

[27] We agree with TCEQ that contingency measures must account for a 3% reduction in emissions, which has long been EPA's interpretation of the Clean Air Act's contingency measure provisions. 80 Fed. Reg. 12286; 42 U.S.C. §§ 7502(c)(9), 7511a(c)(9).
[28] *See Portland Cement Ass'n v. EPA*, 665 F.3d 177, 185-88 (D.C. Cir. 2011) (arbitrary to fail to do so).

ATTACHMENT A

Attachment A – Top 10 VOC Point Source Emission Facilities in the Eight County HGB Nonattainment Area and Ten County DFW Nonattainment Area

ACCOUNT	RN	COMPANY	SITE	COUNTY	REGION	SIC	SIC DESCRIPTION	REPORTING YEAR	VOC TPY
HG0232Q	RN102579307	EXXON MOBIL CORPORATION	BAYTOWN REFINERY	HARRIS	12	2911	PETROLEUM REFINING	2021	2,202.17
GB0004L	RN102535077	BLANCHARD REFINING COMPANY LLC	GALVESTON BAY REFINERY	GALVESTON	12	2911	PETROLEUM REFINING	2021	1,684.57
BL0082R	RN100225945	THE DOW CHEMICAL COMPANY	DOW TEXAS OPERATIONS FREEPORT	BRAZORIA	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	780.97
HG0659W	RN100211879	SHELL CHEMICAL LP	DEER PARK CHEMICALS	HARRIS	12	2911	PETROLEUM REFINING	2021	745.12
CI0008R	RN102323268	ENTERPRISE PRODUCTS OPERATING LLC	MONT BELVIEU COMPLEX	CHAMBERS	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	732.33
HG0033B	RN100542281	EQUISTAR CHEMICALS LP	CHANNELVIEW COMPLEX	HARRIS	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	732.07
HG0261J	RN100224815	KM LIQUIDS TERMINALS LLC	PASADENA TERMINAL	HARRIS	12	4226	SPECIAL WAREHOUSING AND STORAGE	2021	727.20
HG0229F	RN102574803	EXXON MOBIL CORPORATION	BAYTOWN CHEMICAL PLANT	HARRIS	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	726.20
HG0048L	RN100218130	HOUSTON REFINING LP	HOUSTON REFINING	HARRIS	12	2911	PETROLEUM REFINING	2021	679.51
HG0310V	RN103919817	CHEVRON PHILLIPS CHEMICAL COMPANY LP	CEDAR BAYOU PLANT	HARRIS	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	654.58

ACCOUNT	RN	COMPANY	SITE	COUNTY	REGION	SIC	SIC DESCRIPTION	REPORTING YEAR	VOC TPY
ED0168P	RN100213537	DARTCO OF TEXAS LLC	DARTCO OF TEXAS WAXAHACHI	ELLIS	4	3089	PLASTICS PRODUCTS, NEC	2021	611.37
TA0157I	RN102505963	GENERAL MOTORS LLC	ARLINGTON ASSEMBLY PLANT	TARRANT	4	3711	MOTOR VEHICLES AND CAR BODIES	2021	418.71
ED0011D	RN100216472	CHAPARRAL STEEL MIDLOTHIAN LP	CHAPARRAL STEEL MIDLOTHIAN PLANT	ELLIS	4	3312	BLAST FURNACES AND STEEL MILLS	2021	332.10
JHA012L	RN104928676	ETC TEXAS PIPELINE LTD	GODLEY PLANT	JOHNSON	4	1321	NATURAL GAS LIQUIDS	2021	216.93
ED0099J	RN100219286	HOLCIM US INC	MIDLOTHIAN PLANT	ELLIS	4	3241	CEMENT, HYDRAULIC	2021	188.07
TA0156K	RN100212356	LOCKHEED MARTIN CORPORATION	US AIR FORCE PLANT 4	TARRANT	4	3721	AIRCRAFT	2021	139.44
JH0025O	RN100213719	JOHNS MANVILLE	JOHNS MANVILLE CLEBURNE PLANT	JOHNSON	4	3296	MINERAL WOOL	2021	135.51
ED0051O	RN100223585	OWENS CORNING INSULATING SYSTEMS LLC	WAXAHACHIE PLANT	ELLIS	4	3296	MINERAL WOOL	2021	84.28
DBA039N	RN100641752	POLY-AMERICA INC	POLY-AMERICA	DALLAS	4	3089	PLASTICS PRODUCTS, NEC	2021	77.89
WN0021G	RN100223619	ENLINK MIDSTREAM SERVICES LLC	BRIDGEPORT GAS PLANT	WISE	4	1321	NATURAL GAS LIQUIDS	2021	71.27

ATTACHMENT B

Attachment B – Top 10 NOX Point Source Emission Facilities in the Eight County HGB Nonattainment Area and Ten County DFW Nonattainment Area

ACCOUNT	RN	COMPANY	SITE	COUNTY	REGION	SIC	SIC DESCRIPTION	REPORTING YEAR	NOX TPY
FG0020V	RN100888312	NRG TEXAS POWER LLC	WA PARISH ELECTRIC GENERATING STATION	FORT BEND	12	4911	ELECTRIC SERVICES	2021	5,667.15
HG0228H	RN102212925	EXXON MOBIL CORPORATION	BAYTOWN OLEFINS PLANT	HARRIS	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	2,258.20
HG0232Q	RN102579307	EXXON MOBIL CORPORATION	BAYTOWN REFINERY	HARRIS	12	2911	PETROLEUM REFINING	2021	1,930.25
GB0004L	RN102535077	BLANCHARD REFINING COMPANY LLC	GALVESTON BAY REFINERY	GALVESTON	12	2911	PETROLEUM REFINING	2021	1,526.65
BL0082R	RN100225945	THE DOW CHEMICAL COMPANY	DOW TEXAS OPERATIONS FREEPORT	BRAZORIA	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	1,508.58
HG0659W	RN100211879	SHELL CHEMICAL LP	DEER PARK CHEMICALS	HARRIS	12	2911	PETROLEUM REFINING	2021	1,309.88
BL0758C	RN100825249	CHEVRON PHILLIPS CHEMICAL COMPANY LP	SWEENY OLD OCEAN FACILITIES	BRAZORIA	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	1,130.31
HG0033B	RN100542281	EQUISTAR CHEMICALS LP	CHANNELVIEW COMPLEX	HARRIS	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	1,109.21
BL0002S	RN100238708	INEOS USA LLC	CHOCOLATE BAYOU PLANT	BRAZORIA	12	2869	INDUSTRIAL ORGANIC CHEMICALS, NEC	2021	991.10
CI0012D	RN100825371	NRG TEXAS POWER LLC	CEDAR BAYOU GEN STATION	CHAMBERS	12	4911	ELECTRIC SERVICES	2021	890.01

ACCOUNT	RN	COMPANY	SITE	COUNTY	REGION	SIC	SIC DESCRIPTION	REPORTING YEAR	NOX TPY
ED0066B	RN100217199	TXI OPERATIONS LP	MIDLOTHIAN PLANT	ELLIS	4	3241	CEMENT, HYDRAULIC	2021	1,495.19
ED0099J	RN100219286	HOLCIM US INC	MIDLOTHIAN PLANT	ELLIS	4	3241	CEMENT, HYDRAULIC	2021	1,249.65
KB0176S	RN100213420	LUMINANT GENERATION COMPANY LLC	FORNEY POWER PLANT	KAUFMAN	4	4911	ELECTRIC SERVICES	2021	1,099.27
JH0045I	RN100210889	TEXAS LIME COMPANY	TEXAS LIME	JOHNSON	4	3274	LIME	2021	609.78
ED0034O	RN100225978	ASH GROVE CEMENT COMPANY	MIDLOTHIAN PLANT	ELLIS	4	3241	CEMENT, HYDRAULIC	2021	531.15
ED0011D	RN100216472	CHAPARRAL STEEL MIDLOTHIAN LP	CHAPARRAL STEEL MIDLOTHIAN PLANT	ELLIS	4	3312	BLAST FURNACES AND STEEL MILLS	2021	411.19
WN0021G	RN100223619	ENLINK MIDSTREAM SERVICES LLC	BRIDGEPORT GAS PLANT	WISE	4	1321	NATURAL GAS LIQUIDS	2021	299.74
ED0332D	RN102596400	MIDLOTHIAN ENERGY LLC	MIDLOTHIAN ENERGY FACILITY	ELLIS	4	4911	ELECTRIC SERVICES	2021	241.96
DB0252S	RN101559235	MOUNTAIN CREEK POWER LLC	MOUNTAIN CREEK STEAM ELECTRIC STATION	DALLAS	4	4911	ELECTRIC SERVICES	2021	234.43
WN0211W	RN102584844	WISE COUNTY POWER COMPANY LLC	WISE CO POWER PLANT	WISE	4	4911	ELECTRIC SERVICES	2021	155.81