



April 5, 2016

Kristin Patton
MC207, State Implementation Plan Team, Office of Air
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Comments to State Designation Boundary Recommendations to the EPA for the 2015 NAAQS

Dear Ms. Patton:

The City of Seguin, Guadalupe County, Texas (Seguin), which is part of the San Antonio-New Braunfels Metropolitan Statistical Area (MSA), appreciates the opportunity to comment on the TCEQ's designation recommendation to the Environmental Protection Agency (EPA) for the 2015 Ozone NAAQS. The City of Seguin participates in the Alamo Area Council of Government's Air Resources Committee and generally agrees with, and joins in, the Comments submitted by the AIR Executive Committee. As part of the MSA Seguin comments separately because under the TCEQ's current designation of Nonattainment for Bexar County coupled with Unclassifiable/Attainment for Guadalupe County will, in all likelihood, result in the EPA designating the entire MSA, including Seguin, as Nonattainment.

Seguin agrees with the Air Executive Committee that, at this time, Bexar County should be designated as Unclassifiable/Attainment. To the extent that matters stated therein area applicable, Seguin adopts the reasoning set forth in the Air Executive Committee's Comment Letter as if fully set forth herein. Seguin is also willing to continue the consideration of additional control measures such as enacting and enforcing an anti-idling ordinance and insuring that no open burn permits are issued during high ozone season. Additionally, the City has been modernizing its fleet, instituted a bus route, and taken other measures to decrease its potential contribution of precursors to ozone formation.

The City also notes that high ozone days in Bexar County largely occur during meteorological conditions that greatly increase pollutants resulting from transport. This phenomena occurs primarily from areas outside the state of Texas (most notably from the Gulf of Mexico – and sources upwind therefrom).

Additionally, an ozone monitor is located at the Seguin Outdoor Learning Center (C506). Seguin has the largest municipal population located wholly in Guadalupe County. Based on the data obtained from that TCEQ monitor (see (last visited 3/29/2016): http://www.tceq.state.tx.us/cgi-bin/compliance/monops/8hr_4highest.pl), Guadalupe County should be designated at

“Attainment” rather than “Unclassifiable.” In fact, looking at the available data for 2013-2015, Seguin’s 4th highest 8 hour average, 69ppm occurred in 2013. The fourth highest average has decreased each year since that time, with a three year average of 65ppm. From this data it is clear that Seguin and, by extension, all of Guadalupe County meet the 2015 NAAQS for ozone supporting a designation of Attainment. Seguin respectfully requests that the TCEQ change the designation of Guadalupe County from Unclassifiable to Attainment.

Somewhat related to this matter, and a matter of great concern to Seguin, is that it appears that TCEQ has removed the Seguin Outdoor Learning Center (C506) from service, or for some reason unknown to Seguin no data is available for 2016. Seguin believes that it should have been formally notified of this change prior to its occurrence. Seguin also believes that this monitor is necessary, particularly with respect to any decisions by TCEQ or the EPA over the MSA that will be eventually covered by any designation of Nonattainment.

Respectfully submitted,

Don Keil, Mayor