

## Outline of Oral Comments for Houston EPA Hearing – February 2, 2010

- Williamson County supports clean air.
- Transport ozone from currently non-attainment areas contribute significantly to Williamson County and Travis County ozone load.
- The latitude provided under the act to provide “an adequate margin of safety” to consider “an unacceptable risk of harm, even if the risk is not precisely identified” is not adequately offset by the “increasing uncertainty associated with [the] understanding of the likelihood of such effects at lower O<sub>3</sub> levels” nor does it provide for equivalent latitude for a finding of no significant impact. A significant part of the proposed rules are set for “the judgment of the Administrator.”
- Williamson County has voluntarily been and active participant in Clean Air Efforts (Clean Air Coalition, Clean Air Force, Early Action Compact, Clean Air Partners, and enhanced inspection maintenance and monitoring since 1993.
- Proposed rules and attainment timetables do not sufficiently differentiate between transport and local sourced VOC and NO<sub>x</sub>.
- Timetables for attainment unduly penalize areas subject to transport/background ozone.