



TEXAS CHEMICAL COUNCIL

1402 Nueces Street • Austin, Texas 78701-1586 • (512) 646-6400 • Fax (512) 646-6420

July 29, 2016

Ms. Jessica Myers, Ph.D.
Air Pollutant Watch List Coordinator
Texas Commission on Environmental Quality
Toxicology Division
MC-168
P.O. Box 13087
Austin, TX 78711

RE: Proposed De-Listing of Texas City from Air Pollution Watch List for Propionaldehyde

Dear Ms. Myers:

On behalf of the Texas Chemical Council (TCC), I am writing to support the Texas Commission on Environmental Quality's (TCEQ) proposed de-listing of propionaldehyde in the Texas City, Texas Air Pollutant Watch List (APWL) area ("APWL 1202").

TCC is a statewide trade association representing over 70 chemical manufacturers operating approximately 200 Texas facilities. The Texas chemical industry has more than \$75 billion in physical assets in the state, and pays over \$1 billion annually in state and local taxes and over \$20 billion in federal income taxes. TCC's members provide over 75,000 direct jobs and over 450,000 indirect jobs to Texans across the state. TCC member companies manufacture products that improve the quality of life for all Americans and millions of people around the world.

TCC appreciates the continuous work by TCEQ and industry to reduce the level of propionaldehyde in the Texas City APWL area. Specifically, we credit TCEQ's continued use of monitoring and air permitting efforts in the APWL area, and the TCEQ Toxicology Division's (efforts to modernize their requisite standards. We also applaud industry – and The Dow Chemical Company, formerly Union Carbide, specifically – for their voluntary measures to effectively reduce the emissions of this pollutant.

TCEQ's Toxicology Division established the odor-based ambient monitoring comparison value (AMCV) at 9 ppb_v, but in September 2015 revised the AMCV for propionaldehyde, along with numerous other odorous pollutants, to more appropriately assess odor nuisance conditions rather than mere detection of a pollutant. The current odor-based AMCV is 40 ppb_v. This revision was based on the Toxicology Division's guidance document, "Approaches to Derive Odor-Based Values," and the resulting Development Support Document (DSD) for propionaldehyde issued in September 2015. TCC submitted supportive comments on this guidance document.

After the creation of APWL 1202 in 2001, Dow Chemical – the area’s primary emitter of propionaldehyde – under a Quality Assurance Project Plan (QAPP) developed in conjunction with TCEQ, designed and implemented an ambient monitoring study to support the delisting of propionaldehyde, which they initiated in July 2014, and further implemented various strategies and efforts at their Texas City facility to reduce propionaldehyde emissions. Those strategies include the following:

- Controlling vent emissions and installing a flare;
- Re-routing emissions from a flare 150 feet from the company’s fence line to the site’s flare located 1,300 feet from the fence line;
- Reducing the concentration of propionaldehyde residue that is loaded into barges;
- Routing emissions from Tank 2853 to the site’s flare;
- Removing Tank 9213 from propionaldehyde service and controlling degassing activities from propionaldehyde tanks;
- Controlling propionaldehyde emissions from water wash lines to reduce line clingage and clearing; and
- Controlling initial filling emissions with a control device with at least 90 percent control efficiency for internal floating roof tanks that contain propionaldehyde.

Following implementation of those strategies and the initiation of the ambient monitoring study, none of the collected samples determined to be valid under the QAPP exceeded the current health-based AMCV or the current odor-based AMCV. In fact, the highest odor-based sample collected, measuring at 29.81 ppb_v, is significantly below the AMCV of 40 ppb_v. Additionally, as noted by TCEQ, no complaint incidents or complaint investigations related to Dow-Texas City were initiated from 2010 through 2015.

Because TCEQ believes that all appropriate measures are in place to ensure with reasonable expectation that the levels of propionaldehyde in the Texas City APWL will remain below the odorous AMCV levels, and in light of the revised odor-based AMCV based on the guidance document, “Approaches to Derive Odor-Based Values,” and the resulting Development Support Document (DSD) for propionaldehyde, TCC fully supports the delisting of propionaldehyde from the Texas City APWL area. It is clear that sufficient emissions reductions of propionaldehyde have been secured in the area, and will continue to ensure no exceedances of the odor-based AMCV will occur.

Thank you for your consideration of these comments. If you have any questions, please do not hesitate to contact me at (512) 646-6403 or landwehr@texaschemistry.org.

Yours respectfully,



Martha K. Landwehr
General Counsel