



## Pollution Control Services Department

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May 15, 2017

Docket No. EPA-HQ-OA-2017-0190

RE: Comments on Docket No. **EPA-HQ-OA-2017-0190**, "Evaluation of Existing Regulations"

Via: <http://www.regulations.gov>

Dear Sir or Madam:

Thank you for the opportunity to submit comments regarding the agency-wide evaluation of existing regulations in accordance with Executive Order 13777. Harris County Pollution Control Services Department (PCS) is the local regulatory enforcement authority for air, water, and solid waste issues in Harris County, Texas. We understand that EPA has solicited comments from stakeholders regarding specific topics that relate to federal regulations. PCS would like to take this opportunity to request that **EPA retain the 2012 average fuel economy standard of 54.5 miles per gallon by 2025 as required by 40 CFR Parts 85, 86, and 600.**

Harris County is in nonattainment of both the 2008 and 2015 National Ambient Air Quality Standards (NAAQS) for ozone. Ground level ozone forms by the reaction of nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC), of which NO<sub>x</sub> is the limiting compound in our air shed. The Texas Commission on Environmental Quality (TCEQ) has determined that, in the Houston-Galveston-Brazoria region, 67% of NO<sub>x</sub> is emitted by mobile sources, vs 26% from point sources and approximately 7% from nonpoint sources. Industrial point source emissions, therefore, contribute approximately 1/4 of NO<sub>x</sub> emissions in the region while motor vehicles contribute 2/3. Estimates of the cost to further reduce industrial NO<sub>x</sub> emissions in 2015 ranged from EPA's estimate of \$8,300 per ton to an industry group's estimate of \$15,000 per ton. PCS is therefore concerned that it may not be technically or economically feasible to meet the current or previous ozone NAAQS without maintaining the current requirement to achieve an average of 54.5 mpg in light-duty passenger vehicles by model year 2025.

PCS appreciates this opportunity to offer comments. Should you have any questions, please contact Matt Van Vleck, Air Specialist - Harris County Pollution Control Services Department at 713-920-2831 or by e-mail at [matt.vanvleck@pcs.hctx.net](mailto:matt.vanvleck@pcs.hctx.net).

Sincerely,

A handwritten signature in blue ink that reads "Bob Allen".

Bob Allen  
Director