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CITY OF HOUSTON
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DAILY READING FILE

January 22, 2009

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OFFICE OF THE
EXECUTIVE SECRETARIAT

Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, D.C. 20460

Carol M. Browner
White House Coordinator for Energy and Climate Policy
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

**RE: City of Houston's July 9, 2008 Request for Correction of
Information under the Data Quality Act relating to Emission Factors,
Equations and Estimates from Petroleum Refineries and Chemical
Plants**

Dear Administrator Jackson and Ms. Browner,

I write to urge you to respond promptly and favorably to the above-referenced Request for Correction (RFC), the response to which is several months overdue, according to USEPA's own rules. The RFC sets forth in detail the urgent need to revise the methodologies for developing emissions inventories for the nation's refineries and chemical plants because the current methodologies significantly understate emissions of volatile organic compounds, including carcinogens. These understated inventories are relied upon by USEPA and others in assessing the health risk to impacted communities, and because they understate the actual risk posed by these sources, the ability to protect public health is compromised.

As the RFC explains, the emission factors, equations and estimates currently used to develop inventories are acknowledged by USEPA to be unreliable. USEPA itself has reported on several occasions the substantial understatement of

inventories developed using current methodologies. Direct observation studies cited by USEPA conducted in the Houston area and elsewhere provide empirical evidence that actual emissions can be as much as 100 times the emissions derived under current formulae. In light of the overwhelming consensus that the current methodologies are flawed, USEPA should act quickly to revise them.

The RFC asked for three specific actions from USEPA: (1) establish firm deadlines to address the fundamental data quality errors identified in the RFC; (2) require refineries and chemical plants to verify emissions inventories by using direct measurement technologies and fence line monitoring; and (3) immediately prohibit the use of emission factors for facility-specific determinations pertaining to NSR and require facilities to demonstrate actual emissions reductions via direct measurement.

The understatement of these inventories has an especially adverse impact on Houstonians because of the large number of refineries and chemical plants clustered in our area. Even under the current emission inventory methodologies, Houston area refineries and chemical plants report some of the highest emissions of carcinogens in the nation. In fact, the 13 largest benzene emitters among all U.S. chemical plants are located in Texas, and 6 of those 13 are in the Houston area. The refinery with the highest level of benzene emissions in the country is located within the city limits of Houston. Ambient levels of benzene in Houston neighborhoods are too high, and yet because health risk assessments, including the benzene residual risk analysis, are based on understated emission inventories, control strategies that could protect affected communities are not even considered.

I am available to discuss this matter at your convenience and look forward to working with you on this and other important environmental challenges.

Sincerely,

A handwritten signature in black ink that reads "Bill White". The signature is written in a cursive, slightly slanted style.

Bill White
Mayor

CITY OF HOUSTON

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Houston, Texas 77002

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