

Ways to Clear the Air Over Texas



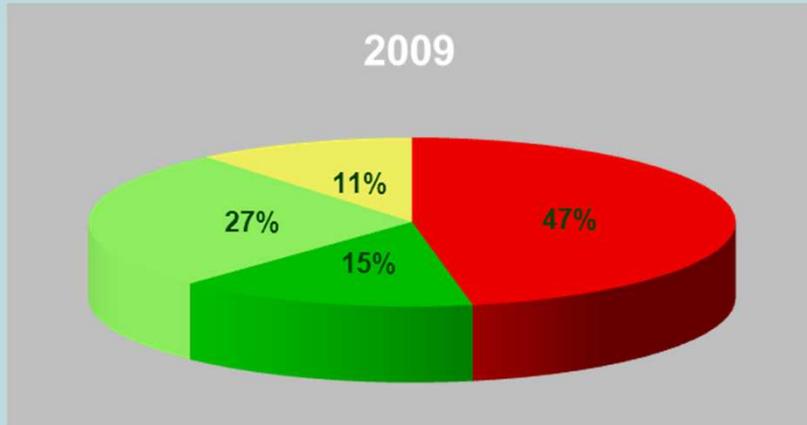
**TESTIMONY OF TOM “SMITTY” SMITH
PUBLIC CITIZEN
BEFORE THE
HOUSE ENVIRONMENTAL REGULATION COMMITTEE
SEPTEMBER 24, 2012**

What you can do to clear the air:



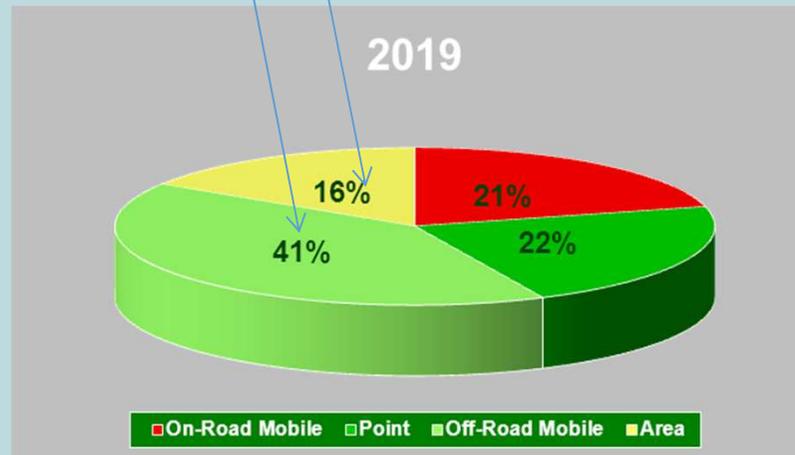
- Quit adding to the problem
- Require maximum controls
- Assess cumulative impacts before permitting
- Limit permits by rule
- Create special air quality districts to limit regional pollution
- Spend the accumulated TERP funds to reduce accumulated air pollution
- Begin to prepare for climate disruptions

Where does pollution come from?



As cars and trucks get cleaner.....

Off road mobile and rural emissions (power plants and fracking get bigger)



Quit Adding to the Problem

Require Adequate Controls Up Front



Fracking/Flaring



Studies on both sides of the debate have simple rules to minimize damages

- Isolate wells & prevent leaks
- Treat water responsibly- use brackish or recycled water and dispose of it safely
- Eliminate venting, minimize flaring & other emissions
- Limit Flaring to Emergencies

Coal Plants



Look at the impact of emission on down wind cities and require that that a new source has strong enough pollution controls not to deteriorate level of a non-attainment area, look at waste disposal, impact on climate and water use

Coal Exports



Massive coal export facilities are being permitted by rule.

TCEQ fails to evaluate and consider cumulative emissions generated by the coal blown off the coal piles, increased train, truck, and vessel activity or various ship/vessel engines at dockside.

Ports



Ports are expected to grow by 45% with the widening of the Panama Canal. This will mean more and bigger ships, thousands of additional engines added to move the freight dockside and tens of thousands of additional trucks needed to haul the freight.

A significant reduction can occur if we require additional equipment to be tier 4.

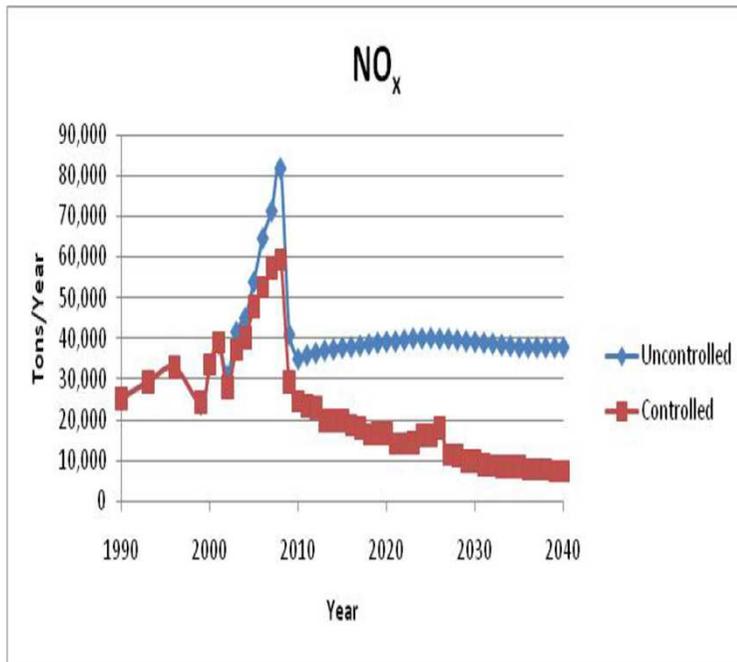
Controls Work If Required In Time

Look at fracking emissions



Emissions

Figure 4-14. Controlled and Uncontrolled Emissions Projections (NO_x Tons/Year)



	NO _x	VOC	PM _{2.5}
Uncontrolled			
Tons per year	36,519	4,689	3,282
Tons per day	100	12.85	8.86
Controlled			
Tons per year	22,800	1,285	1,028
Tons per day	62	4.7	2.8

- Average number of engines - 21 per job
- Average age - 8 years
- 1.9 million truck trips per year in Eagle Ford at 380 per well for 5,000 wells
- 2007 was when new emissions standards kicked in

Cumulative Impacts



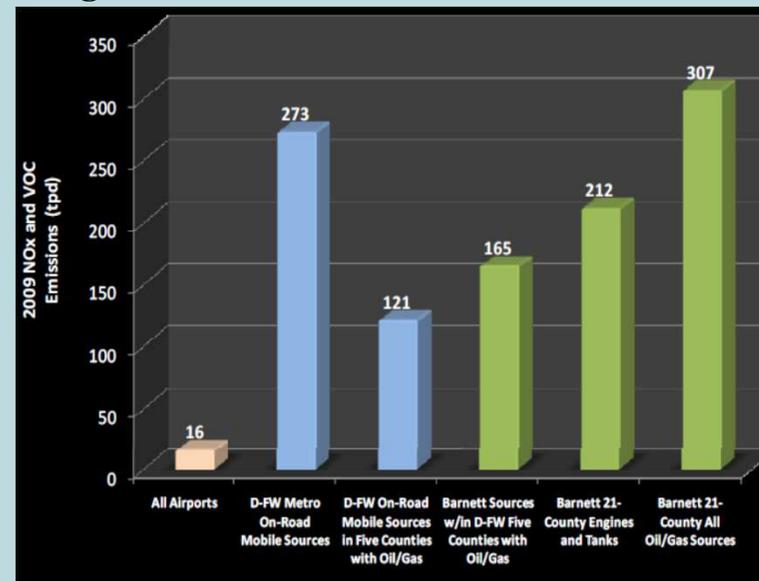
Coal Plants

Texas permitted 12 coal plants that would have added so much pollution to the DFW air shed, had they all been built, could have kept DFW from reaching attainment.

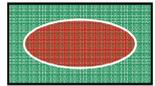
Fracking

Barnett Shale emissions will soon exceed **cars and trucks** in the DFW area.

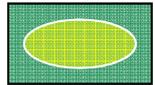
Eagle Ford emissions could cause San Antonio to become non-attainment due to fracking.



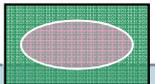
Recent Texas Coal Plants



- In Non-Attainment

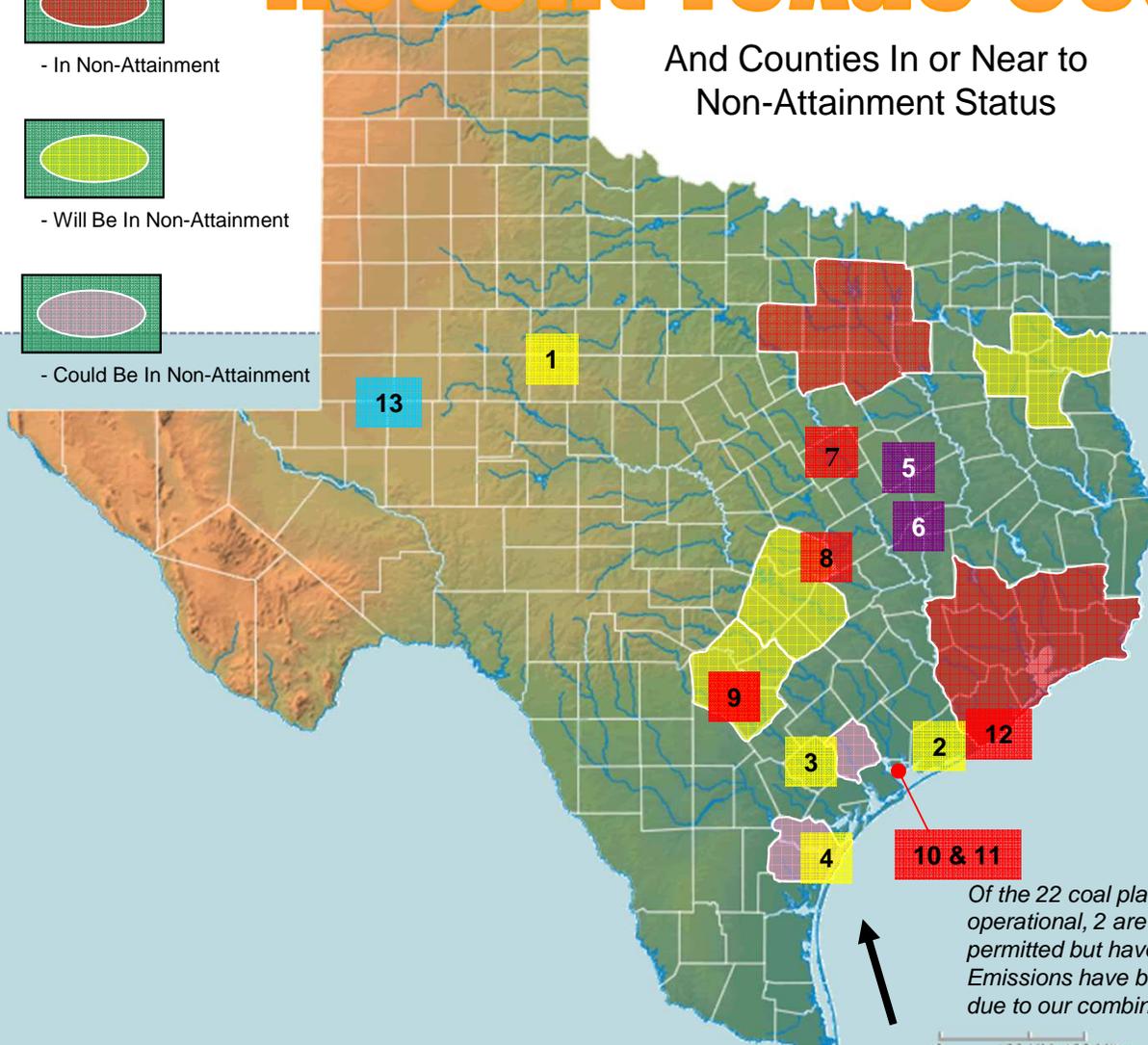


- Will Be In Non-Attainment



- Could Be In Non-Attainment

And Counties In or Near to Non-Attainment Status



Coal	
1. Tenaska *	(A)
2. White Stallion	(A)
4. Las Brisas	(A)
5. Limestone	(P)
6. Oak Grove	(O)
7. Sandy Creek	(T)
8. Sandow	(O)
9. Spruce	(O)
10. Summit IGCC *	(P)

* Carbon Separation
 ** Carbon Offsets
 T- testing
 A – Appeal
 P – Permitted, not under construction
 O – Operational
 C-Construction

Of the 22 coal plants proposed in 2006, 9 have withdrawn, 4 have become operational, 2 are under construction, 3 are under appeal, 4 have been permitted but have not begun construction. Emissions have been reduced by 20 to 80% (depending upon emission type) due to our combined efforts

Prevailing Gulf Winds

Limit Permits by Rule



Fracking/Flaring

- Small amounts of emissions from 18,000 wells add up to a big emissions problem.
- While new tougher PBR's are in place for the Barnett Shale they don't apply to the Eagle Ford or other areas.
- The emissions from fracking may have pushed San Antonio into non-attainment.

Coal Exports



- Massive coal export facilities are being permitted by rule.
- Permitting by rule of these facilities fails to evaluate and consider the cumulative impact of emissions blown off the coal piles, increased train, truck, material handling and ship engines



Reduce Port Emissions

- Require new Tier 4 engines and 2007 or new trucks;
- Use TERP to replace or retrofit old, high-emission equipment and vehicles with more efficient, less-polluting models;
- Retrofit and add-on devices designed to reduce NO_x and PM emissions from port equipment and vehicles;
- Build infrastructure to support qualifying fuels, electrification; and
- Limit idling time.

Reduce Fracking Emissions

- Modify TERP to allow clean up of fracking equipment.
 - Include Eagle Ford and Barnett Shale counties in list of affected counties for TERP eligibility
- Clean up or retrofit old diesel equipment at well sites.

Create Special Air Quality Control Districts



- Sec. 382.012. STATE AIR CONTROL PLAN. The commission shall prepare and develop a general, comprehensive plan for the proper control of the state's air.
- Sec. 382.013. AIR QUALITY CONTROL REGIONS. The commission may designate **air quality control regions based on jurisdictional boundaries, urban-industrial concentrations, and other factors, including atmospheric areas, necessary to provide adequate implementation of air quality standards.**
- Develop districts around emerging air control problems like power plants and fracking.

Spend the TERP funds to get ahead of the problem



- According to the TCEQ, the fund balance in TERP totaled \$412.8 million on August 31, 2011.
 - the projected fund balance as of August 31, 2013 is **\$601.7 million**
- These funds could be used to prevent additional areas from becoming non - attainment
- Average TERP project reduced NO_x at \$4, 407
- Average Emission Reduction Credit price = \$42,532 ton per year

If You Don't Reduce CO2 Emissions Plan to Deal with Climate Impacts



Climate impacts include more frequent and severe:

- Heat waves
- Drought
- Sea level rise
- Wildfires
- West Nile / Dengue Fever and other insect borne tropical diseases
- Agricultural collapse

