

Bryan W. Shaw, Ph.D., P.E., *Chairman*
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EI-26329

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 28, 2018

Mr. Joshua Wayland
Surface Transportation Board
395 E. Street, SW
Washington, DC 20423-0001

Via: E-mail

Re: TCEQ NEPA Request #2018-166, STB Docket No. FD 36186, Texas Railway Exchange – Construction and Operation – in Galveston County, Texas: Preliminary Environmental Consultation; Galveston, Texas, Galveston County

Dear Mr. Wayland:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

The proposed project is located in Galveston County, which is currently classified by the United States Environmental Protection Agency as moderate nonattainment for the 2008 ozone National Ambient Air Quality Standard. Therefore, general conformity rules apply. The TCEQ is also evaluating the South Coast Air Quality Management District v. EPA, No. 15-1115 (D.C. Cir. 2018), which in the future could potentially result in a change of classification for previous ozone standards for Galveston County.

The two primary precursors to ozone formation are volatile organic compounds (VOCs) and nitrogen oxides (NOx). A general conformity analysis may be required when a project in an ozone moderate nonattainment area results in an emissions increase of 100 tons per year (tpy) or greater for either VOC or NOX, and one may be required when a project in an ozone serious nonattainment area results in an emissions increase of 50 tpy or greater.

We recommend the environmental assessment address actions that will be taken to prevent surface and groundwater contamination.

Any debris or waste disposal should be at an appropriately authorized disposal facility.

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA Coordinator, at (512) 239-3500 or NEPA@tceq.texas.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Vise".

Ryan Vise
Division Director
Intergovernmental Relations