



October 23, 2013

Ozone Advance
c/o Laura Bunte
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards, C304-01
109 TW Alexander Drive
Research Triangle Park, NC 27711

Re: Ozone Advance Program

Dear Ms. Bunte:

Northeast Texas Air Care (“NETAC”) is a voluntary association of governmental officials and representatives of industry and public interest groups working to address ozone air quality issues in a five county Northeast Texas area consisting of Gregg, Harrison, Rusk, Smith, and Upshur counties. Since 1996, NETAC has worked with the Texas Commission on Environmental Quality (“TCEQ”) and the U.S. Environmental Protection Agency (“EPA”) to address ozone air quality concerns in Northeast Texas. Our efforts have included two separate voluntary emission reduction agreements—a Flexible Attainment Region (“FAR”) agreement executed in 1997, and an Early Action Compact (“EAC”) agreement executed in 2002. These voluntary efforts have resulted in significant air quality improvements that have brought the five county NETAC area into attainment with EPA’s evolving ozone air quality standards including the 120 ppb one hour ozone standard, the 80 ppb eight hour ozone standard adopted in 1997, and the 75 ppb ozone standard adopted in 2008.

We are pleased the EPA has created the Ozone Advance program as a means to continue collaborative efforts to reduce ozone levels and improve air quality and public health protection. We support the goal of implementing measures and programs to reduce ozone in the five county NETAC area in the near term and agree that it is in our best interest to work together and in coordination with stakeholders and the public to actively pursue this goal.

We also recognize that the Ozone Advance program will enhance our ability to achieve the goals of:

- Increasing public awareness of ground-level ozone as an air pollutant;
- Reducing ozone air pollution levels;
- Insuring healthy continued healthy ozone levels;
- Maintaining attainment with the ozone National Ambient Air Quality Standard (“NAAQS”);

- Helping avoid violations of the ozone NAAQS that could lead to future non-attainment designations;
- Targeting limited resources toward actions to address ozone problems quickly and appropriately.

Please consider this letter as our request for participation in the Ozone Advance program. As requested in the Ozone Advance program guidance, we are providing the following information to demonstrate that the five county NETAC area meets the Ozone Advance eligibility criteria:

- The five county NETAC area consists of Gregg, Harrison, Rusk, Smith, and Upshur counties.
- The NETAC area is designated as attainment under both the 1997 and 2008 ozone National Ambient Air Quality Standard.
- The following air quality monitors, maintained by TCEQ, reflect the air quality in the NETAC area: Longview C19/A127/C644 (AQSNO.481830001); Tyler Airport Relocated C82 (AQSNO.48423007); and Karnack C85/AFHP303(AQSNO.482030002).
- Existing emissions inventory reporting requirements have been met by TCEQ.

Should you have any questions concerning our request to participate in the Ozone Advance program, please feel free to contact us directly using the contact information shown below. Additionally, you may contact NETAC's general counsel Jim Mathews at jmathews@mandf.com or by phone at (512) 404-7800.

Sincerely,



Judge Bill Stoudt
County Judge, Gregg County
101 E. Methvin, Suite 300
Longview, Texas 75601



Barbara Bass
Mayor, City of Tyler
212 N. Bonner St.
Tyler, Texas 75702

CC : Zac Covar, Texas Commission on Environmental Quality
David Cleveland, East Texas Council of Governments
Jim Mathews, NETAC General Counsel