

Questionnaire
Texas Commission on Environmental Quality
Texas On-Site Wastewater Treatment Research Council

Name: Daniel Bullock

Organization you represent: Gulf Coast Clean Energy Application Center

Area of interest: Combined heat and power

The Gulf Coast Clean Energy Applications Center (GC RAC) is a program of the Houston Advanced Research Center (HARC), an independent 501(c)(3) non-profit organization involved in sustainable development and commercialization of environmentally-promising technologies. The GC RAC program, which was launched in January 2005, is supported by funding from the U.S. Department of Energy. The overall goal of the program is to facilitate greater deployment of clean energy technologies such as combined heat and power (CHP), waste heat recovery, and district energy in Texas, Louisiana, and Oklahoma. The GC RAC supports regional stakeholders, policy makers, and adopters through educational outreach, project support services, and policy development initiatives. The GC RAC works with state agencies on a wide variety of regulatory initiatives relating to energy efficiency distributed generation, and renewable energy.

Texas Commission on Environmental Quality

1. What changes should be made to the mission or functions of the Texas Commission on Environmental Quality (TCEQ)?

No comment.

2. Should any changes be made to TCEQ's structure or organization? Does TCEQ coordinate well with other state, federal, and local agencies? Are any of its functions duplicative of other entities?

No comment.

3. Is TCEQ's regulation of Texas' environment appropriate to protect human and natural resources? Is its regulation fair to all participants? If not, what changes would you recommend?

No comment.

4. How effectively does TCEQ fulfill its permitting responsibilities? What changes, if any, would you recommend?

All across the state, Texans use small (< 10 MW) natural gas fired engines and combustion turbines to pump water, compress natural gas, and generate electricity. However, the

regulation of NOx emissions from those engines depends upon what they do. For equipment manufacturers and project developers, a single set of consistent requirements would clean the air while simplifying the permitting process. Simply put, the emissions levels required of any prime mover should not depend on the type of work it provides. TCEQ should examine opportunities to harmonize the air quality standards across the various applications using natural gas engines and turbines.

5. How effective are TCEQ's compliance and monitoring activities? What changes, if any, would you recommend?

No comment.

6. How effective is TCEQ's enforcement? What changes, if any, would you recommend?

No comment.

7. How well does TCEQ solicit public participation when developing agency guidelines, rules, and policies? What improvements can be made?

No comment.

8. How well does TCEQ communicate with stakeholders and the public? Address complaints? What changes, if any, should be made in this area?

No comment.

9. Should the Texas Commission on Environmental Quality be continued for 12 years? Why or why not?

No comment.

Texas On-site Wastewater Treatment Research Council

10. Should the Texas On-site Wastewater Treatment Research Council be continued as a separate entity for 12 years? What changes should be made to its structure or functions? How effective is the Council's grant program?

No comment.

Other

11. Please add any other comments about the Texas Commission on Environmental Quality or the Texas On-site Wastewater Treatment Research Council. If you would like to suggest any changes to the agencies, their operations, or their statute, please provide:

- a brief statement of the suggested change,
- background information on how the current system works and a description of what you would like to see changed,
- benefits of your recommendation, and
- any potential difficulties that may arise from implementing your recommendation.

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