

Topics for Discussion
TCGA Environmental Affairs Committee
2025 Summer Meeting

1. **TCEQ issues:**

- 12 Inspections this year:
 - o 10 Random Compliance Inspections (mainly in Panhandle)
 - o 1 Employee complaint (no response from TCEQ)
 - o 1 – Neighbor complaint (no response from TCEQ)
- Emission Inventory
 - o 52 TX Gins Submitted for 2024
 - 52 inventories have been successfully submitted, validated and completed and awaiting final letters
 - o Also submitted for 4-KS, 0-NM and 1-OK Emissions Inventory

2. **FDA Animal Feed Rule**

- No movement since February 2020 – Indications that FDA will hopefully remove cottonseed storage registration sometime within the next year. Will be taken care of at the staff level.
- This is the rule that just won't go away.

3. **NAAQS Issues**

- Dr. Wakelyn's Involvement in Clean Air Forum and NR3.
 - o We continue to partner with NCC with our NR3 membership.
 - o NR3 is leading effort to fix the PM_{2.5} standard problem.
- EPA continues to review the NAAQS.
 - o PM₁₀ 24-hour standard unchanged – 150 ug/m³.
 - o PM_{2.5} 24-hour remain the same at 35 ug/m³.
 - o PM_{2.5} Annual limit reduced from 12 ug/m³ to 9 ug/m³.
- Review was done through a reconsideration.
 - o Trump now planning to review the reconsideration.
 - o This will get it done quicker, but will not reset the five year clock.

4. **Permit Applications and progress.**

- Total Permitted - 179 Gins (181) – USDA shows 166 operated in 2024 (*submitted samples*)
- Permit Processing Information:
 - o Total of 64 approved this year, compared to 95 last year.
 - o We had 85 in process at end of survey period.
 - o Construction/New permits – 0 completed this year.
 - o Renewals – 33 approved this year, compared to 62 last year.
 - o Amendments – 11 approved this year, compared to 5 last year.
 - o Std Permit/PBR/PCP – 7 approved this year, compared to 4 last year.
 - o Other (Alterations) – 13 approved this year, compared to 24 last year.

5. **TCGA Contract Services**

- We worked with 30 non-gin facilities on permit issues.
- Submitted emissions inventories for (4) gins in Kansas, (0) in New Mexico and (1) in Oklahoma.