

Jon Niermann, *Chairman*  
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Bobby Janecka, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 26, 2020

Ken McQueen  
Regional Administrator  
U.S. Environmental Protection Agency, Region 6  
1201 Elm Street, Suite 500  
Dallas, TX 75270-210

Subject: Redesignation request for Milam County, Texas

Dear Administrator McQueen:

The Texas Commission on Environmental Quality (TCEQ) requests that the United States Environmental Protection Agency (EPA) redesignate Milam County, Texas, as attainment for the 2010 Sulfur Dioxide (SO<sub>2</sub>) National Ambient Air Quality (NAAQS) in the upcoming Round 4 designations. On September 18, 2015, Texas determined an unclassifiable/attainment designation for Milam County. However, on December 13, 2016, the EPA designated Milam County unclassifiable because the EPA could not determine at the time whether the area was meeting the standard.

On November 15, 2016, the TCEQ added the Milam County Rockdale John D. Harper Road air quality monitor 483311075 (CAMS 1075) to the TCEQ real-time data collection system. The monitor was activated on November 19, 2016. This monitor was designed to be a source-oriented monitor addressing Luminant Generation Company's Sandow 5 Generating Plant, which the TCEQ had identified for air quality characterization in January 2016, per the SO<sub>2</sub> Data Requirements Rule (DRR). The DRR requirements for this monitor have now all been met, and the 2019 design value was 14 parts per billion (ppb). Further, the current preliminary 2020 design value for SO<sub>2</sub>, calculated from the available 2018 through 2020 air quality monitoring data, is 3 ppb.

The TCEQ believes that Milam County should be designated attainment for the 2010 SO<sub>2</sub> NAAQS based on the fact that this source-oriented monitor provided three years of complete data showing current and consistent compliance with the 2010 SO<sub>2</sub> NAAQS, and that the Sandow 5 Generating Plant permanently ceased operations in January 2018.

Thank you for your consideration of this request. If you have any questions or need additional information, please contact Donna F. Huff, Air Quality Division Director, at 512-239-6628 or by email at [donna.huff@tceq.texas.gov](mailto:donna.huff@tceq.texas.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Toby Baker".

Toby Baker  
Executive Director

bcc: Tonya Baer, Deputy Director, Office of Air  
Donna Huff, Director, Air Quality Division  
Vincent Meiller, Assistant Director, Air Quality Division