



GOVERNOR GREG ABBOTT

September 18, 2015

Ms. Janet G. McCabe  
Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20760

Dear Ms. McCabe:

Pursuant to Section 107(d) of the Federal Clean Air Act, please find the attached proposed sulfur dioxide designations from Dr. Bryan W. Shaw, Chairman of the Texas Commission on Environmental Quality.

Sincerely,

A handwritten signature in black ink that reads "Greg Abbott".

Greg Abbott  
Governor

GA:jzk

Attachment

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 18, 2015

Ms. Janet G. McCabe  
Assistant Administrator, Office of Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20760

Dear Ms. McCabe:

This responds to a letter received by the Texas Commission on Environmental Quality (TCEQ) from the U.S. Environmental Protection Agency (EPA) on March 20, 2015, which requests updates to the state's recommendation of area designations for the 2010 primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>) by September 18, 2015. Texas continues to support the use of ambient air monitoring data as the appropriate information for use in making designation decisions. However, since the EPA is now requesting additional information for use in the designation decision process, the TCEQ submits additional information to support the recommended designations. As stated below, I recommend that counties in Texas be designated either attainment based on monitoring data or unclassifiable/attainment where there are no monitors. The recommended designations are consistent with the EPA's updated designations guidance for SO<sub>2</sub> dated March 20, 2015, which states that in the absence of information that clearly shows attainment or nonattainment, the EPA intends to designate an area unclassifiable/attainment. Monitoring data is necessary for accurate characterization of actual air quality for attainment and nonattainment designations.

### The Latest Monitoring Data Supports Texas' Previous Recommendation

There continue to be no monitored violations in Texas of the 2010 SO<sub>2</sub> standard. As recommended by the State of Texas in 2011 and 2012 and reiterated in comments submitted to the EPA in 2013 and 2014, every county with monitoring data that meets quality assurance requirements for the 2010 SO<sub>2</sub> NAAQS should be designated attainment based on the actual, observed air quality data from that county. Each of the counties with no monitoring data should be designated unclassifiable/attainment for the 2010 SO<sub>2</sub> NAAQS.

Eleven Texas counties have certified monitoring data showing no violations, supporting a designation of attainment for the 2010 SO<sub>2</sub> NAAQS. Attachment A: *Recommended Designations for the 2010 One-Hour SO<sub>2</sub> Primary NAAQS*, shows the 2012, 2013, and 2014 design values for Dallas, El Paso, Ellis, Galveston, Gregg, Harris, Jefferson, Kaufman, McLennan, Navarro, and Nueces Counties. Texas recommends attainment designations for each of these 11 counties. Texas recommends unclassifiable/attainment designations for the remainder of the state (243 counties).

Additional Evaluation of Counties Containing EPA-identified Sources

As referenced in the EPA's letter, a March 2, 2015 court approved consent decree calls for the EPA to complete designations for the 2010 SO<sub>2</sub> NAAQS in three additional rounds from 2016 to 2020. For this first round of additional designations, the EPA named 12 power plants in Texas fitting the consent decree criteria to evaluate for any impacts on attainment of the SO<sub>2</sub> NAAQS.

Additional information to support specific designations for the areas where these EPA-identified sources are located, including source modeling, has been requested by the EPA. Notwithstanding our disagreement with any use of modeled predictions to determine attainment status, the TCEQ was able to conduct modeling for three of the 12 power plants identified by the EPA. Modeling was performed according to guidelines in the EPA's SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document (TAD), using actual emissions information from the Air Markets Program database and the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) modeling system. The constrained time frame did not allow for the TCEQ's analysis of all 12 EPA-identified SO<sub>2</sub> emissions sources, or to conduct in-depth analyses, determine model input refinements, or develop detailed graphics.

Attachment B: *TCEQ's Analyses*, identifies the information that the TCEQ considered in evaluating four of the 12 EPA-identified sources. Those four sources include the three TCEQ-modeled sources - Coletto Creek Power Station, Tolk Generating Station, and Twin Oaks Power Station - along with Sandy Creek Energy Station, which submitted its own modeling and other information for the EPA's consideration. Although Texas continues to recognize AERMOD's shortcomings as a tool for determining NAAQS designations, this modeling information is submitted to further support the unclassifiable/attainment designations recommended for Goliad, Lamb, and Robertson Counties.

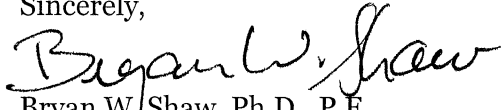
Memorandums summarizing the modeling results for Coletto Creek Power Station, Tolk Generating Station, and Twin Oaks Power Station are contained in Attachment B: *TCEQ Analyses, Part 2: Modeling Analyses*. The modeling analysis for each of the three facilities indicate there is no significant impact to attainment of the 2010 SO<sub>2</sub> NAAQS in the counties where they are located, or in any other county in Texas, from these facilities. The analyses also indicate that compliance with the 2010 SO<sub>2</sub> standard in Goliad, Lamb, and Robertson Counties, is not significantly impacted by any other SO<sub>2</sub> emission source.

While the TCEQ did not model the Sandy Creek facility, the company's submittal supports Texas' recommendation of attainment for McLennan County based on regulatory SO<sub>2</sub> monitoring data. Additional information can be found in Attachment C: *Evaluation of the Impact of Sandy Creek Energy Station SO<sub>2</sub> Emissions*. Coletto Creek Power, LP submitted information to the TCEQ regarding the Coletto Creek Power Station, one of the facilities modeled by the TCEQ. That submittal is included in Attachment D: *Information Submitted to the TCEQ for the Coletto Creek Power Station*. San Miguel Electric Cooperative, Inc. submitted information to the TCEQ regarding the San Miguel Electric Plant. That submittal is included in Attachment E: *Information Submitted to the TCEQ for the San Miguel Electric Plant*. NRG Texas Power LLC also submitted information to the TCEQ, regarding the Limestone Generating Station and the W A Parish Electric Generating Station, included in Attachment F: *Information Submitted to the TCEQ for the Limestone Generating Station and the W A Parish Electric Generating Station*. These information submittals clearly support a final unclassifiable/attainment designation for Goliad, Atascosa, Limestone, and Fort Bend Counties.

Ms. Janet G. McCabe  
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Thank you for your consideration of this submittal. Please accept our updated recommendation for the 2010 SO<sub>2</sub> NAAQS designations for Texas. If there are any questions concerning this recommendation, please contact Mr. Steve Hagle, P.E., Deputy Director, Office of Air, at 512-239-1295 or [Steve.Hagle@tceq.texas.gov](mailto:Steve.Hagle@tceq.texas.gov). We look forward to working with the EPA throughout this process.

Sincerely,

  
Bryan W. Shaw, Ph.D., P.E.  
Chairman

Attachments

cc: Richard A. Hyde, P.E., Executive Director, TCEQ  
Steve Hagle, P.E., Deputy Director, TCEQ Office of Air  
Ron Curry, EPA R6 Administrator  
Guy Donaldson, EPA R6