

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 12, 2017

Mr. Ron Curry
Regional Administrator
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: Modeling analysis for the Oklaunion Power Station, Wilbarger County, Texas

Dear Mr. Curry:

On June 29, 2016, the Texas Commission on Environmental Quality (TCEQ) informed the United States Environmental Protection Agency (EPA) of the methods intended for characterizing air quality in 24 areas of the state containing sulfur dioxide (SO₂) sources previously identified as meeting the criteria for evaluation under the *Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)* (80 FR 51052).

The TCEQ identified an area of Wilbarger County near Vernon, Texas, where the Oklaunion Power Station is located as the only area of the state to be characterized through modeling under the data requirements rule (DRR). A protocol for the planned modeling was submitted to the EPA along with the list of characterization methods planned. That previously submitted protocol is included with this letter as Attachment A: *1-Hour SO₂ Data Requirement Rule Air Quality Modeling Protocol for the Oklaunion Power Station Vernon, TX*.

American Electric Power Service Corporation (AEPSC), on behalf of Oklaunion Power Station, submitted a modeling analysis for the facility in accordance with the submitted protocol on December 19, 2016. Additional information and revised modeling files were submitted to the TCEQ on January 4, 2017. The modeled level of ambient concentrations of SO₂ near the facility are less than half of the 2010 SO₂ NAAQS. The TCEQ has reviewed the analysis and concurs with its conclusions. A summary of the analysis and TCEQ's review is included as Attachment B: *Modeling Review Summary Document*. The complete modeling report provided by AEPSC is included as Attachment C: *1-Hour SO₂ Data Requirement Rule Air Quality Modeling for the Oklaunion Power Station Vernon, TX*.

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Based upon these modeling results estimating levels below 50 percent of the NAAQS, the TCEQ requests that Wilbarger County be designated unclassifiable/attainment. The TCEQ further requests that this source and area no longer be subject to additional data requirements under the DRR, including annual emissions reporting for the Oklaunion Power Station consistent with Section 51.1205(b)(2), of the final DRR.

Thank you for consideration of this submittal. If you would like to request copies of the modeling files or have specific questions about the modeling, please contact Daniel Menendez at 512-239-1537 (Daniel.Menendez@tceq.texas.gov). Otherwise, please contact Steve Hagle at 512-239-1295 or Steve.Hagle@tceq.texas.gov, or David Brymer at 512-239-1725 or David.Brymer@tceq.texas.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Hyde". The signature is fluid and cursive, with the first name "Richard" being the most prominent part.

Richard A. Hyde, P.E., Executive Director
Texas Commission on Environmental Quality

RAH:mac

Attachments