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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 29, 2016

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

Subject: Air quality characterization plans for areas with identified sulfur dioxide (SO₂) sources

Dear Mr. Curry:

The August 2015 "Data Requirements Rule" (DRR) for the 2010 SO₂ National Ambient Air Quality Standard (NAAQS) requires states to identify the sources within their borders emitting 2,000 or more tons per year of SO₂, in order to determine where further evaluation for the purposes of air quality characterization is needed. The Texas Commission on Environmental Quality (TCEQ) submitted a list to the United States Environmental Protection Agency (EPA) on January 15, 2016, identifying 25 sources with SO₂ emissions at or above the DRR-specified threshold. On April 22, 2016 the TCEQ requested that the EPA amend the list to remove the ExxonMobil Refining and Supply Company's Baytown Refinery. On May 4, 2016, the EPA concurred with the TCEQ's request, leaving 24 SO₂ sources subject to the DRR. The DRR requires air agencies to notify the EPA by July 1, 2016 of the air quality characterization method planned to evaluate each of the areas where the 24 sources are located. This letter responds to that requirement.

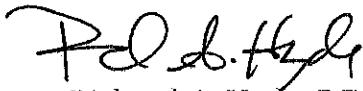
With ambient air quality monitoring being the most accurate and appropriate means of determining compliance with the NAAQS, the TCEQ intends to monitor as many of the identified locations as possible. The TCEQ's 2016 Annual Monitoring Network Plan, which presents the current Texas air monitoring network along with all finalized and proposed changes to the network between July 1, 2015 and December 31, 2017, is to be submitted to the EPA on July 1, 2016. The TCEQ's plans for monitoring SO₂ are contained in Appendix E: *Sulfur Dioxide Data Requirements Rule Monitoring Placement Evaluations* of that plan (https://www.tceq.texas.gov/airquality/monops/network_review.html).

Ron Curry
Page 2
June 29, 2016

The list of 24 sources identified to the EPA for air quality characterization includes 12 sources for which the EPA proposed designations on February 11, 2016, consistent with a March 2, 2015 court-approved consent decree. While these 12 sources are subject to ongoing data requirements per the DRR, there is no need to provide any future air quality characterization plans in addition to those contained in the 2016 monitoring plan, because the EPA is required to designate these 12 sources for the 2010 SO₂ NAAQS by July 2, 2016. However, should the EPA designate any of the 12 sources as unclassifiable (rather than attainment, nonattainment, or unclassifiable/attainment), the TCEQ intends to characterize those sources through monitoring. Accordingly, this plan may need to be revised by the TCEQ since the court-ordered deadline for final designations of these 12 sources falls after this letter is due.

Due to time and resource constraints, the TCEQ plans to utilize modeling results to characterize air quality for the Oklaunion Power Station and surrounding Wilbarger County. As required by the DRR, a protocol for the modeling to be performed is provided in the attachment, *1-Hour SO₂ Data Requirement Rule Air Quality Modeling Protocol for the Oklaunion Power Station Vernon, TX*. If you have any questions, please contact Steve Hagle at 512-239-1295 (Steve.Hagle@tceq.texas.gov), or David Brymer at 512-239-1725 (David.Brymer@tceq.texas.gov).

Sincerely,



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

Enclosure