



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

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DALLAS, TEXAS 75202 - 2733

August 22, 2017

Office of the Regional Administrator

The Honorable John Bel Edwards
Governor of State of Louisiana
PO Box 94004
Baton Rouge, LA 70804

Dear Governor Edwards:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) intended designations for certain areas in Louisiana for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO2). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in letters dated March 26, 2011, and September 18, 2015.

On July 25, 2013, the EPA designated certain areas in 16 states as nonattainment, but did not at that time designate other areas. Additional areas were designated on June 30, 2016, and November 29, 2016. In Louisiana, the following areas were designated in these previous actions: Calcasieu Parish, Desoto Parish and St. Bernard Parish. Pursuant to a March 2, 2015, court-ordered schedule, the agency must complete the remaining SO2 designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of the EPA's assessment of your state's recommended designations for all remaining undesignated areas in Louisiana except areas that are associated with sources for which Louisiana elected to install and begin operating a new SO2 monitoring network. While we are in agreement with your recommendation for many of these areas, some areas warrant further discussion as explained below and in the accompanying technical support document. We stand ready to assist and hope to resolve any differences regarding the proper designation for these areas within this 120-day period provided by the Clean Air Act.

To this end, if you or your staff have additional information that the EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at www.regulations.gov, and sending a copy to EPA Region 6. The EPA also will publish a notice in the Federal Register announcing a 30-day comment period for the public to provide input on the EPA's intended designations.

The State of Louisiana has recommended a designation of unclassifiable for the area indicated below. EPA regulations for implementing the SO2 NAAQS require Louisiana to characterize SO2 air quality in

1 Louisiana also provided information relevant to these designations in letters dated July 25, 2012 and January 13, 2017.
2 Sierra Club v. McCarthy, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

each listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Louisiana. The air monitoring data are consistent with your recommendation. The air dispersion modeling data, however, show either that Evangeline Parish may be violating the 2010 primary SO₂ NAAQS or contains sources that may be contributing to air quality in a nearby area that may be violating the 2010 primary SO₂ NAAQS, which would require a modification of the recommended designation. We invite Louisiana to review the available information and further discuss this issue with the EPA in order to inform an appropriate final designation.

Area	Included Parishes
Evangeline Parish	Evangeline Parish (p) Bounded by UTM coordinates: X Y 570250m E, 3400300m N 570250m E, 3403300m N 572400m E, 3403300m N 572400m E, 3400300m N NAD83 15R

(p) indicates portion of parish

The State of Louisiana has recommended unclassifiable for the areas indicated below. EPA regulations for implementing the SO₂ NAAQS require Louisiana to characterize SO₂ air quality in each listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Louisiana or by a third party. Our review of this information indicates that it is consistent with your recommendation and is due to either a lack of air dispersion modeling or unresolved air dispersion modeling issues. We invite Louisiana to review the available information and further discuss this issue with the EPA in order to inform an appropriate final designation. The EPA intends to designate each listed area as a separate unclassifiable area, as indicated.³

Unclassifiable Area	Included Parishes
Ascension Parish	Ascension Parish
St. Mary Parish	St. Mary Parish
Pointe Coupee Parish	Pointe Coupee Parish

EPA regulations for implementing the SO₂ NAAQS require Louisiana to characterize SO₂ air quality in each listed area. The State of Louisiana recommended unclassifiable in 2011, but submitted air dispersion modeling demonstrating attainment in 2017 for the area indicated below. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Louisiana or by a third party. Our review of this information indicates that it is consistent with your most recent submittal. The EPA intends to designate each listed area as a separate unclassifiable/attainment area as indicated.

³ Our intended designated areas include all areas of Indian country located in the indicated areas.

Unclassifiable/Attainment Area	Included Parishes
Rapides Parish	Rapides Parish

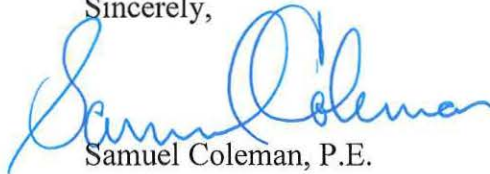
Enclosure 1 to this letter provides the information that supports the intended designation decisions for these areas in Louisiana.⁴

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Louisiana that were not required to be characterized and for which the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in Enclosure 2.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. We are then required to designate all other remaining undesignated areas in Louisiana (East Baton Rouge Parish, St. Charles Parish, St. James Parish, and West Baton Rouge Parish) by December 31, 2020, consistent with the prescribed timing of the court order.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO₂ NAAQS. For additional information regarding designations under the SO₂ NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Dayana Medina of my staff at telephone: (214) 665-7241, email: medina.dayana@epa.gov.

Sincerely,



Samuel Coleman, P.E.
Acting Regional Administrator

Enclosures

cc: Chuck Carr Brown, Ph.D., Secretary, Louisiana Department of Environmental Quality
Bijan Sharafkani, Confidential Advisor, Louisiana Department of Environmental Quality

⁴ Enclosure 1 is Chapter 16 of the Technical Support Document for the designations EPA plans to complete by December 31, 2017, that addresses areas in Louisiana. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>

Enclosure 2

List of all remaining areas of Louisiana that were not required to be characterized and for which the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. The EPA intends to designate each of these areas as a separate unclassifiable/attainment area.

Parish
Acadia Parish*
Allen Parish*
Assumption Parish*
Avoyelles Parish*
Beauregard Parish*
Bienville Parish*
Bossier Parish*
Caddo Parish*
Caldwell Parish*
Cameron Parish*
Catahoula Parish*
Claiborne Parish*
Concordia Parish*
East Carroll Parish*
East Feliciana Parish*
Evangeline Parish (p)
Franklin Parish*
Grant Parish*
Iberia Parish*
Iberville Parish*
Jackson Parish*
Jefferson Parish*
Jefferson Davis Parish*
Lafayette Parish*

Lafourche Parish*
La Salle Parish*
Lincoln Parish*
Livingston Parish*
Madison Parish*
Morehouse Parish*
Natchitoches Parish*
Orleans Parish*
Ouachita Parish*
Plaquemines Parish*
Pointe Coupee Parish*
Red River Parish*
Richland Parish*
Sabine Parish*
St Helena Parish*
St John the Baptist Parish*
St Landry Parish*
St Martin Parish*
St Tammany Parish*
Tangipahoa Parish*
Tensas Parish*
Terrebonne Parish*
Union Parish*
Vermilion Parish*
Vernon Parish*
Washington Parish*
Webster Parish*
West Carroll Parish*
West Feliciana Parish*
Winn Parish*

An asterisk (*) indicates that the intended designation for this parish or portion of a parish represents a modification to the designation that Louisiana has most recently recommended.