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GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE SECRETARY

September 18, 2015

Ron Curry, Administrator
US EPA, Region 6 (6-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

RE: State of Louisiana
Recommendations for Sulfur Dioxide Area Designations
March 20, 2015 Updated Guidance

Dear Mr. Curry:

On March 20, 2015, the United States Environmental Protection Agency (US EPA) issued "Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard." This guidance was based upon a consent decree entered into on March 2, 2015, in the US District Court of the Northern District of California by the US EPA and plaintiffs Sierra Club and Natural Resources Defense Council (Case No. 13-cv-03953). States with indicated areas were given until September 18, 2015, to submit a recommendation to US EPA.

The first phase of designations, which will be promulgated by July 2, 2016, address stationary sources that according to the US EPA's Air Markets Database either emitted more than 16,000 tons of SO₂ or emitted more than 2,600 tons of SO₂ and had an average emission rate of 0.45 lbs. of SO₂/mmbtu or higher in 2012. Three facilities in Louisiana were identified as fitting these categories:

- 1.) Nelson Industrial Steam Company – Calcasieu Parish;
- 2.) R S Nelson Generation Plant – Calcasieu Parish; and
- 3.) Dolet Hills Power Station – De Soto Parish.

Therefore, in accordance with Section 107(d) of the Clean Air Act Amendments of 1990 the state of Louisiana, through the Louisiana Department of Environmental Quality (LDEQ), is pleased to propose recommendations for the areas indicated as follows:

- Based on technical reviews of available monitoring data and supportive modeling results that demonstrate the ambient air in the area surrounding the two facilities located in Calcasieu Parish are in compliance with 2010 SO₂ NAAQS, the Department recommends a designation of *attainment*.
- Based on the lack of a qualified monitor in the area surrounding the facility in De Soto Parish, LDEQ recommends a designation of *unclassifiable*. At this time, LDEQ is working with facility representatives to properly site, install, and operate a SO₂ monitor prior to the end of 2015. In accordance with the Data Requirements Rule for the 2010 1-Hour SO₂ Primary NAAQS, air quality in De Soto Parish would be addressed in future area designations (80 FR 51052).

Mr. Ron Curry
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Documentation to support the LDEQ's recommendation for each parish can be found in the attached enclosures. If you have any questions, please contact Cheryl Nolan, Administrator of the Air Permits Division, at (225) 219-3408.

Sincerely,



Peggy M. Hatch
Secretary

C: Mark Hansen, Acting Associate Director of Air Programs
Guy Donaldson, Chief Air Planning Section

PMH/VHA/apdp

Enclosures:

Calcasieu Parish Supporting Document
De Soto Parish Supporting Document