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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 15, 2016

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

Subject: Sulfur dioxide (SO₂) sources identified for further evaluation and air quality characterization

Dear Mr. Curry:

Pursuant to the 2010 SO₂ National Ambient Air Quality Standard (NAAQS) "Data Requirements Rule" (DRR) of August 2015, states and tribes must determine which sources within their borders emit 2,000 or more tons per year (tpy) of SO₂. By January 15, 2016, air agencies are required to provide the United States Environmental Protection Agency (EPA) with a list of the sources determined to fit that DRR specification. The EPA's stated purpose for identification of these sources is to determine the locations where further evaluation and characterization of the air quality in surrounding areas is needed and to determine compliance with the 2010 SO₂ NAAQS in those areas. Enclosed with this letter is a list of 25 total sources in Texas with SO₂ emissions at or above 2,000 tons in 2014.

In developing the enclosed list of sources, the Texas Commission on Environmental Quality (TCEQ) reviewed the 2014 SO₂ emissions inventory data reported to the State of Texas Air Reporting System to identify those sources emitting 2,000 or more tpy of SO₂. The list includes 12 sources identified by the EPA's March 20, 2015 letter for designation by July 2, 2016. The EPA determined that these sources were subject to expedited area designations according to a March 2, 2015 court-ordered consent decree. The TCEQ submitted additional analyses for seven of the 12 sources to the EPA on September 18, 2015, supporting that these areas should be attainment (Sandy Creek Energy Station) and unclassifiable/attainment (Tolk Generating Station, Twin Oaks Power Station, Coletto Creek Power Station, San Miguel Electric Plant, Limestone Generating Station, and W A Parish Electric Generating Station). Along with these 12 sources identified by the EPA, the enclosed list includes 13 additional sources with SO₂ emissions meeting or exceeding 2,000 tpy.

If you have 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,

A handwritten signature in black ink that reads "Richard A. Hyde".

Richard A. Hyde, P.E.,
Executive Director

Enclosure

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Texas SO₂ Sources with Reported Emissions Greater Than or Equal to 2,000 Tons in 2014

RN	COUNTY	OWNER	SITE	2014 Routine El (tpy)
101198059	FREESTONE	LUMINANT GENERATION CO LLC	*BIG BROWN STEAM ELECTRIC STATION	57,460
102583093	RUSK	LUMINANT GENERATION CO LLC	*MARTIN LAKE ELECTRICAL STATION	53,660
100888312	FORT BEND	NRG TEXAS POWER LLC	*WA PARISH ELECTRIC GENERATING STATION	43,981
100542927	LIMESTONE	NRG TEXAS POWER LLC	*LIMESTONE ELECTRIC GENERATION STATION	27,862
102147881	MILAM	LUMINANT GENERATION CO LLC	*LUMINANT SANDOW YORKTOWN POWER PLANT	21,943
102285921	TITUS	LUMINANT GENERATION CO LLC	*MONTICELLO STEAM ELECTRIC STATION	20,515
100213370	TITUS	SOUTHWESTERN ELECTRIC POWER CO	WELSH POWER PLANT	18,225
100217975	BEXAR	CITY PUBLIC SERVICE	CALAVERAS PLANT	17,133
100226919	GOLIAD	COLETO CREEK POWER LP	*COLETO CREEK POWER STATION	16,934
100224534	LAMB	SOUTHWESTERN PUBLIC SERVICE CO	*TOLK STATION	16,753
100224849	POTTER	SOUTHWESTERN PUBLIC SERVICE CO	*HARRINGTON GENERATING STATION	15,465
100209287	JEFFERSON	OXBOW CALCINING LLC	OXBOW CALCINING	11,319
100216191	ROBERTSON	OAK GROVE MGMT COMPANY LLC	OAK GROVE STEAM ELECTRIC STATION	7,404
100226539	ATASCOSA	SAN MIGUEL ELECTRIC COOPERATIVE INC	*SAN MIGUEL ELECTRIC PLANT	6,909
100226026	HOWARD	SID RICHARDSON CARBON CO	BIG SPRING CARBON BLACK	5,947
100226570	ROBERTSON	MAJOR OAK POWER LLC	*OPTIM ENERGY TWIN OAKS Power Plant	5,762
100222413	HUTCHINSON	SID RICHARDSON CARBON LTD	BORGER CARBON BLACK PLT	4,863
100209386	ORANGE	ORION ENGINEERED CARBONS LLC	ECHO CARBON BLACK PLANT	4,255
101062255	WILBARGER	PUBLIC SERVICE CO OF OKLAHOMA	OKLAUNION POWER STATION	3,506
100211283	NAVARRO	TRNLWS LLC	STREETMAN PLANT	3,350
100209659	HUTCHINSON	ORION ENGINEERED CARBONS LLC	BORGER CARBON BLACK PLANT	3,027
100214287	HARRISON	SOUTHWESTERN ELECTRIC POWER CO	AEP PIRKEY POWER PLANT	2,916
104136700	MCLENNAN	SANDY CREEK SERVICES LLC	*SANDY CREEK ENERGY STATION	2,648
105369805	MILAM	LUMINANT GENERATION CO LLC	SANDOW 5 GENERATING PLANT	2,260
102579307	HARRIS	EXXONMOBIL REFINING & SUPPLY CO	**BAYTOWN REFINERY	2,204

* Sources identified by the EPA in March 2015.

** ExxonMobil Refining and Supply Company provided the TCEQ with 2015 SO₂ emissions inventory data for its Baytown refinery on January 14, 2016. The data provided indicates that the facility's annual routine SO₂ emissions for 2015 are 1,452 tons. The reduction in SO₂ emissions is due to the implementation of new techniques minimizing or in some cases eliminating the disposal and/or processing of high sulfur content storage tank residual liquids. It is expected that SO₂ emissions at this facility will remain below the 2,000 ton per year threshold.