UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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MAR 2 4 2017

Mr. Richard C. Chism
Director, Monitoring Division (MC 165)
Texas Commission on Environmental Quality
Post Office Box 13087
Austin, TX 78711-3087

Dear Mr. Chism:

This letter responds to the Texas Commission on Environmental Quality (TCEQ) emails sent to the U.S. Environmental Protection Agency (EPA) in October and November of 2016, requesting the EPA's comments on the TCEQ's evaluations for placement of sulfur dioxide ($SO_2$) monitors near the three following Luminant Generation Company, LLC facilities: Big Brown Steam Electric Station (Big Brown) in Freestone County, Monticello Steam Electric Station (Monticello) in Titus County, and Martin Lake Electrical Station (Martin Lake) in Rusk County.

As you are aware, these proposed monitors are not required pursuant to the $SO_2$ design network criteria in section 4.4.2 of appendix D to part 58 of title 40 of the Code of Federal Regulations (CFR), because the Population Weighted Emissions Index requirements are not met. The proposed monitors are also not required pursuant to section 51.1203(c) of the Data Requirements Rule, 40 CFR part 51, subpart BB, for the 2010 $SO_2$ 1-Hour Primary National Ambient Air Quality Standard (NAAQS), because the facilities are in areas designated as nonattainment for that NAAQS.

Since there are no current federal requirements for monitoring $SO_2$ in these areas, we are neither approving nor disapproving the placement of these monitors at this time. However, if you would like these monitors included as "special purpose monitors," you must include them in your annual network plan. 40 CFR §58.20(a). Please note that any data collected from a special purpose monitor using a federal reference method (FRM), federal equivalent method (FEM), or approved regional method (ARM) must meet the requirements of §58.11, §58.12, and appendix A of part 58 (or an approved alternative to appendix A) and must be submitted to Air Quality System. *Id.* at §58.20(b). Additionally, all data from a special purpose monitor using an FRM, FEM, or ARM which has operated for more than 24 months may be used for comparison to the relevant NAAQS. *Id.* at §58.20(c). Prior EPA approval is not required to discontinue a special purpose monitor. *Id.* at §58.20(f).

We understand the TCEQ's goal is to place these monitors in locations that will characterize the highest $SO_2$ concentrations in areas impacted by each source. The TCEQ should evaluate whether one monitor for each source is sufficient for this goal. Please note that if these data are to be used to support a future request by the TCEQ for redesignation of the affected area to attainment, it will be important that the monitors be located in the areas of the maximum concentration in order for the EPA to determine whether the monitoring data indicates that the area is attaining the NAAQS.

All three of the TCEQ's evaluations currently rely on older modeling that uses 2012-2014 meteorological and emissions inventory data and does not include some further refinements included in more recently available modeling. We recommend that the TCEQ conduct an evaluation that uses



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currently available information. For example, more refined or more recent and refined modeling used by the EPA in determining the 2010 $SO_2$ NAAQS designations for these areas indicates that the TCEQ's proposed monitor locations are not sited in the areas of highest expected concentrations. Comparing the TCEQ's proposed locations with this more recent/refined modeling, we have provided some analyses for the three facilities that we recommend the TCEQ consider as you move forward:

Big Brown: Using the more recent/refined model results, it appears that the TCEQ's proposed location #12 (approx. 1.2 km west of facility) is at approximately 62% of the maximum value modeled and not near the area of highest expected concentration. The maximum in that modeling is located in a different direction about 3.9 km to the northwest of the facility.

Martin Lake: Using the more recent/refined model results, it appears that the TCEQ's preferred location #1 (approx. 2.6 km to the north-northeast of the facility) is approximately 57% of the maximum value modeled. The maximum in that modeling is located in a different direction about 4 km to the west-southwest of the facility.

Monticello: Using the more refined model results, it appears that the TCEQ's preferred location #1 to the north of the facility is approximately 79% of the maximum value modeled. The maximum in that modeling is located in a different direction about 4 km to the west-southwest of the facility.

We appreciate the extra work and effort that the TCEQ is putting into evaluating $SO_2$ concentrations in these areas. If you have any questions, please contact me at (214) 665-2172 or Mr. Mike Miller of my staff at (214) 665-7550.

Sincerely yours,

Frances Verhalen, P.E.
Chief
Air Monitoring/Grants Section