UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

MAY 26 2016

Deidra Johnson
Attorney Supervisor
Office of the Secretary
Legal Division
Louisiana Department of Environmental Quality
P.O. Box 4302
Baton Rouge, LA 70821-4302

Dear Ms. Johnson:

Thank you for the opportunity to review and comment on the proposed revisions to the Louisiana Administrative Code (LAC) LAC Title 33 Part III Sections 1105.A, LAC 33:III.1107.A (AQ361), and LAC 33:III.2153.B.1.i (AQ362) in response to the EPA's Startup, Shutdown, and Malfunction (SSM) State Implementation Plan (SIP) Call. See 80 FR 33840, June 12, 2015. The EPA appreciates the LDEQ's efforts to address the SSM SIP Call. It is our understanding that Louisiana intends to repeal and remove from the Louisiana SIP the provisions identified above.

Our specific comments are:

1. Louisiana's SIP submittal letter should include a statement that Louisiana is requesting the EPA's review/approval of the removal of sections identified above from the Louisiana SIP, as required by the EPA's SSM SIP Call of June 12, 2015 (80 FR 33967).
2. Due to the fact that Louisiana is proposing to remove certain provisions from the Louisiana SIP, a demonstration under Clean Air Act Section 110(l) is a necessary component of your SIP submittal to the EPA. See 80 FR 33975, June 12, 2015. If you require assistance with the requirements for an appropriate Section 110(l) demonstration, the EPA Regional staff can provide such assistance.
3. The April 20, 2016 Notice of Intent for AQ361, the fourth paragraph refers to "LAC 33:III.1507.A and B." However, the rule change does not reflect revisions to these sections. Is this a typographical error? Please explain.
4. The SSM SIP Call also identified several other provisions of the Louisiana SIP, LAC 33:III.2201.C.8, LAC 33:III.1507.A.1, LAC 33:III.1507.B.1, LAC 33:III.2307.C.1.a, and LAC 33:III.2307.C.2.a, as substantially inadequate. See 80 FR 33975, June 12, 2015. Please note that these sections will also need to be addressed to comply with the SSM SIP call.

Should you have any questions regarding this letter, please feel free to contact me at (214) 665-7242.

Sincerely,

Guy Donaldson
Chief
Air Planning Section