



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE SECRETARY

Mr. Ron Curry, Regional Administrator
US EPA Region 6 (6-RA)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: Data Requirements Rule Characterization Approach Revision
Calcasieu Parish Facilities

Dear Mr. Curry:

On June 30, 2016, the state of Louisiana submitted a list of applicable sources and the anticipated approach the state would use to characterize the air quality in each respective area. The state indicated through the submittal that sources in Calcasieu Parish would use monitoring as the approach with which to determine whether or not the areas surrounding applicable sources are in attainment with the 2010 Sulfur Dioxide National Ambient Air Quality Standards (SO₂ NAAQS). At that time, the state did not anticipate the timely production of refined modeling upon which to base the determination.

Since that time, the state has obtained refined modeling concerning the areas surrounding one of the DRR sources. As a result, the state requests that the areas surrounding the DRR sources be split into two distinct source areas for determination of attainment. The first source area shall be referred to as Calcasieu Parish Airshed 1 (Airshed 1). The second shall be Calcasieu Parish Airshed 2 (Airshed 2). Airshed 2 is defined as the area roughly bounded to the east by Elliott Road, to the south by an unnamed bayou, to the west by Moss Lake and to the north by Haymark Road/W. Gauthier Road. Airshed 1 is the remainder of Calcasieu Parish that is not contained in Airshed 2.

Airshed 1 modeling results show that the area is in attainment and the state concurs with the results. The refined modeling showed the same results for hot spots as the monitor siting modelings, which are areas near the Reynold Metals Company – Lake Charles Carbon facility. These hotspots are within Airshed 2 and attainment will be determined based upon monitoring data as previously submitted.

The facilities in the area include:

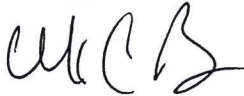
- Reynolds Metals Company-Lake Charles Carbon;
- Citgo Petroleum Corporation - Lake Charles Manufacturing Complex;
- Entergy Gulf States Louisiana LLC - Nelson Industrial Steam Co.;
- Rain Cii Carbon LLC - Lake Charles Calcining Plant;
- Entergy Gulf States Louisiana LLC - Roy S. Nelson Plant;

- Phillips 66 – Lake Charles Refinery; and
- Louisiana Pigment Co. LP – Titanium Dioxide Plant.

The DRR deadline for modeling is January 13, 2017. The state has received a protocol and a model report that outlines the refined modeling that took place. The protocol and report are attached as Appendix A and Appendix B. All model files have been submitted to EPA Region 6 via an ftp site. The state will revise the annual monitoring plan accordingly and will submit said plan by March 31, 2017.

If you have any questions concerning this submittal, please contact Donald P. Trahan, Administrator, Air Permits Division, at donald.trahan@la.gov.

Sincerely,



1/13/17

Chuck Carr Brown, Ph.D.
Secretary

C: Guy Donaldson, Chief
Air Planning Section (6MM-AA)

Attachments