

**ENTERGY LOUISIANA, LLC  
ENTERGY TEXAS, INC.**

**COMMENTS ON EPA’S RESPONSE AND TECHNICAL SUPPORT DOCUMENT FOR  
THE 2010 SULFUR DIOXIDE NATIONAL AMBIENT AIR QUALITY STANDARD  
AREA DESIGNATION FOR CALCASIEU PARISH, LOUISIANA**

**EPA-HQ-OAR-2014-0464**

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**I. INTRODUCTION**

On March 1, 2016, the U.S. Environmental Protection Agency (“EPA” or “Agency”) published in the *Federal Register*, at 81 Fed. Reg. 10,563, the Public Notice of Availability for the Agency’s responses to State designation recommendations (“EPA Response”) for the 2010 Sulfur Dioxide (“SO<sub>2</sub>”) National Ambient Air Quality Standards (“NAAQS”). The EPA Response further identifies the Agency’s intended designation of certain specific areas<sup>1</sup> as either *nonattainment*, *unclassifiable/attainment*, or *unclassifiable* for the 2010 SO<sub>2</sub> NAAQS, and makes available the Technical Support Documents (“TSD”) supporting the intended designations. The EPA Response invited input and comments from interested parties regarding the EPA’s intended designations in order to gather additional information before making final designations for the specific area addressed in the EPA Response.

The EPA Response specifically identifies Calcasieu Parish, Louisiana, as an area which the Agency intends to designate as *unclassifiable*, which intended designation represents a modification of the recommendation by the Louisiana Department of Environmental Quality (“LDEQ”). Entergy Louisiana, LLC, and Entergy Texas, Inc., (collectively, “Entergy”) own and operate facilities located in Calcasieu Parish, Louisiana, which are identified in the EPA Response and TSD as the “Nelson facilities.” See Louisiana TSD at 20-21. Given its operations in this area, Entergy maintains a strong interest in the EPA Response and the proposed designations contained therein. Accordingly, Entergy submits these comments on the EPA Response and TSD for Louisiana.

Entergy appreciates EPA’s consideration of these comments and urges EPA to adopt the recommendations for area designations submitted by the State of Louisiana.

**II. CALCASIEU PARISH, LOUISIANA**

**1. The Uncontradicted Modeling Analysis Supports LDEQ’s Attainment Recommendation for Calcasieu Parish.**

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<sup>1</sup> The specific areas in EPA’s current round of designations, to be completed by July 2, 2016 pursuant to a Consent Decree, address two groups of areas: (1) areas that have newly monitored violations of the 2010 SO<sub>2</sub> NAAQS based on the most recent three calendar years of certified monitored ambient air quality data, and (2) areas that contain any stationary source that had not been announced as of March 2, 2015, for retirement and that according to EPA’s Air Markets Database emitted in 2012 either (i) more than 16,000 tons of SO<sub>2</sub> or (ii) more than 26,000 tons of SO<sub>2</sub> with an annual average emission rate of at least 0.45 pounds of SO<sub>2</sub>/mmBTU. See *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

Entergy supports the recommendation by LDEQ to designate Calcasieu Parish, Louisiana, as in *attainment* for the 2010 SO<sub>2</sub> NAAQS, and urges EPA to adopt the same. In conjunction with its designation recommendation, LDEQ submitted an air quality modeling analysis for Calcasieu Parish to EPA on September 17, 2015, which concluded the SO<sub>2</sub> concentration in Calcasieu Parish is below the 2010 SO<sub>2</sub> NAAQS. Although the Louisiana TSD presents a number of technical concerns regarding the September 2015 air quality modeling analysis, it does not reflect that any additional modeling analysis has been conducted or considered by EPA in proposing to modify LDEQ's *attainment* recommendation. The impact of the alleged technical errors or discrepancies in the September 2015 air quality modeling analysis concerning the area of analysis, meteorology and surface characteristics and background concentrations are trivial and do not justify modification of LDEQ's attainment recommendation, particularly considering that no alternate analysis is available in the public record of EPA's proposed designation. Indeed, many of the alleged technical errors regarding meteorology and surface data are not prohibited by EPA's Modeling Technical Assistance Document and have been accepted by LDEQ and EPA in previous New Source Review modeling analyses.

Furthermore, LDEQ's September 2015 designation recommendation document reflects that LDEQ considered data from three existing ambient air monitors located in Calcasieu Parish that comprise over 99.5% of all SO<sub>2</sub> emissions in Calcasieu Parish; and that all three monitors are in compliance with the 2010 SO<sub>2</sub> NAAQS. Calcasieu Parish Support Document, at .3-5 (Sept. 18, 2015). LDEQ's recommendation document and supporting modeling analysis recognize that all three monitors are located in close proximity to the industrial facilities in consideration under the proposed designation. EPA's own Louisiana TSD includes an apparent contradiction with respect to the Westlake monitor—which shows a monitored concentration of 47% of the NAAQS—by encouraging the use of the monitored data in establishing background concentrations based on the monitor's "close proximity" to Entergy's Nelson facilities (*Id.* at 28), while simultaneously asserting that the monitor is "not representative of the maximum from Nelson facilities and other cumulative sources" *Id.* at 21. In consideration of the entirety of the monitoring data in close proximity to the industrial sources in question and the uncontradicted air quality modeling analysis submitted by LDEQ, EPA should affirm LDEQ's attainment recommendation for Calcasieu Parish, Louisiana.

## **2. The Monitored Design Values Demonstrate that the Nelson Facilities Are Not Causing Exceedances of the 2010 SO<sub>2</sub> NAAQS.**

Both the uncontradicted 2015 air quality modeling analysis and EPA's Louisiana TSD reflect that the most recent design value based on data collected between 2012 and 2014 for the Westlake monitor was 35 ppb, well below the 2010 SO<sub>2</sub> NAAQS. *See* Louisiana TSD at 30. This monitor is located approximately 2.5 km south of the two Nelson facilities, and 10 km north of the area where the Louisiana TSD alleges the greatest impacts of SO<sub>2</sub> emissions are expected based on EPA's grouping analysis. *Id.* Based on the proximity of the Westlake monitor to the Nelson facilities, EPA concludes that the Westlake monitor's design value demonstrates that the two Nelson facilities likely are not causing exceedances of the 2010 SO<sub>2</sub> NAAQS and are not the primary contributors to EPA's predicted maximum concentrations of SO<sub>2</sub>. *Id.* Given these findings, EPA should conclude that SO<sub>2</sub> emissions reductions at the Nelson facilities are not

warranted or necessary to achieve a designation of attainment for Calcasieu Parish for the 2010 SO<sub>2</sub> NAAQS.

**3. EPA Should Allow Additional Time to Evaluate Additional Data After July 2, 2016, if EPA Makes a Final Designation of *Unclassifiable* for Calcasieu Parish.**

Should EPA make a final designation for Calcasieu Parish of unclassifiable for the 2010 SO<sub>2</sub> NAAQS, EPA should allow the State additional time to evaluate additional modeling information and monitoring data for the purpose of determining how LDEQ will further characterize air quality for Calcasieu Parish. It is wholly inequitable and incongruent to require the State and affected sources to comply with the July 1, 2016 deadline for air quality characterization under the Data Requirements Rule (“DRR”) where EPA will not finalize the area designation which triggers applicability of the DRR until July 2, 2016. 80 Fed. Reg. 51,052 (Aug. 21, 2015). For areas designated as unclassifiable on July 2, 2016, States and affected sources will need additional time to further characterize air quality in such areas, and EPA should not arbitrarily impose an unrealistic deadline for completing the additional evaluation at the expense of the public and affected sources.

**III. CONCLUSION**

Entergy appreciates the opportunity to review the EPA Response and the Louisiana TSD and to provide comments and information regarding the same. Review and analysis of the full record of modeling analysis, monitor data and other information submitted by the State of Louisiana and uncontradicted by EPA confirms that EPA should accept LDEQ’s attainment recommendation for the 2010 SO<sub>2</sub> NAAQS for Calcasieu Parish, Louisiana.

Respectfully submitted,



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