Cleco Corporation
2030 Donahue Ferry Rd
P. O. Box 5000
Pineville, LA 71361-5000

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U.S. Environmental Protection Agency
EPA Docket Center
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Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

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RE: **Docket ID No. EPA-HQ-OAR-2014-0464**
Cleco Corporation – Dolet Hills Power Station (DeSoto Parish)
Comments to EPA Recommendation for SO_2 NAAQS Designation
LDEQ Agency Interest No. 585

Dear Sir or Madam:

These comments and the attached supplemental modeling and monitoring reports are submitted by Cleco Corporation ("Cleco") on behalf of the Dolet Hills Power Station located in DeSoto Parish, Louisiana. Cleco requests that these comments be included in the administrative record for this docket and that these comments be considered by the U.S. Environmental Protection Agency ("EPA") when making a final designation related to the 1-hour sulfur dioxide ("SO_2") national ambient air quality standard ("NAAQS") for DeSoto Parish.

As discussed below, Cleco believes EPA should accept the Louisiana Department of Environmental Quality's ("LDEQ's") recommendation to designate DeSoto Parish as "attainment" for the 1-hour SO_2 NAAQS. Based on air quality modeling conducted by American Electric Power (AEP) and monitoring data derived from a properly-sited air monitor located in DeSoto Parish, there is substantial evidence to accept LDEQ's attainment recommendation for this area. If EPA does not accept LDEQ's recommendation, a designation of "unclassifiable/attainment" is more appropriate for DeSoto Parish than the designation recently proposed by EPA.

Background

On March 1, 2016, EPA published a "notice of availability and public comment period" in the Federal Register for certain state designation recommendations for the 2010 1-hour SO_2 NAAQS. *See,* 81 Fed. Reg. 10,563. This notice relates to a second round of SO_2 NAAQS designations for certain areas of the country as required by a consent decree that included a court-ordered designation schedule. *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015). In response to the above-referenced consent decree, EPA notified the state of

Louisiana of the court-ordered designation schedule in correspondence, dated March 20, 2015. In its letter, EPA identified three electric power plant sources in two Louisiana parishes (Calcasieu and DeSoto) that meet the criteria established in the court's order. The letter further provided a designation schedule to comply with the court-ordered deadline.

In response to EPA's notice letter, the LDEQ submitted a report to EPA Region 6 on September 18, 2015 that provided recommendations for designation of the SO_2 NAAQS for Calcasieu and DeSoto Parishes. The LDEQ also submitted a revised recommendation to EPA specifically for DeSoto Parish in correspondence dated November 17, 2015. In this letter, the LDEQ recommended that DeSoto Parish be designated as "attainment" for the 1-hour SO_2 NAAQS. The Sierra Club also provided comments to the LDEQ on September 18, 2015 that included air modeling for DeSoto Parish and submitted updated air modeling to the EPA Air Quality Policy Division in correspondence dated December 14, 2015 for areas in Texas and Louisiana, including DeSoto Parish.

In response to LDEQ's recommendation, EPA Region 6 provided a notification to the state of Louisiana of its intended modifications to the state's proposed recommendations in correspondence, dated February 11, 2016 (also known as the "120-day letter"). With respect to DeSoto Parish, EPA notified the state that it intended to designate a part of the parish as "nonattainment" for the SO_2 NAAQS, and thereby, did not accept the state's recommendation.

EPA's 120-day letter attached a *Technical Support Document*, which included a *Technical Analysis for the DeSoto Parish, Louisiana Area* ("*Technical Analysis for DeSoto*"). *See,* Letter from Ron Curry to Gov. John Bel Edwards, dated Feb. 11, 2016, pp. 6-19. As discussed in the *Technical Analysis for DeSoto*, EPA proposes to designate a rectangular area in DeSoto Parish (shown on Figure 1 (p. 8) of the document) that would include the Dolet Hills Power Station and International Paper's Mansfield Mill.

Specific Comments to EPA 120-Day Letter Related to DeSoto Parish

Cleco provides the following specific comments in response to EPA's letter from Ron Curry to Gov. John Bel Edwards, dated February 11, 2016. Cleco believes these comments and the attached modeling and monitoring analyses justify a different designation for the DeSoto Parish area than what was proposed by EPA in its 120-day letter. Cleco requests that the EPA provide a detailed, written response to each of the following comments.

1. Supplemental air modeling conducted by AEP demonstrates that SO_2 emissions from the Dolet Hills Power Station and the paper mill are below the 1-hour SO_2 NAAQS. This modeling is more accurate than prior modeling analyses conducted by the Sierra Club and the LDEQ and responds to specific issues raised by EPA in its technical analysis.

In response to EPA's 120-day letter, Cleco worked with the co-owner of the Dolet Hills Power Station, AEP, to conduct additional air modeling for the DeSoto Parish area that included more accurate emissions data and stack parameters for the coal-fired electric utility and also included the paper mill located approximately 14 kilometers north of the utility. Unlike the

modeling conducted by the LDEQ, AEP did *not* use the LOWWIND3 modeling option. As discussed below, this modeling analysis demonstrates that the DeSoto Parish area is in attainment with the 1-hour SO_2 NAAQS based on the actual operating conditions of both major sources. The modeling was performed in accordance with EPA's draft air modeling guidance document entitled, *SO_2 NAAQS Designations Modeling Technical Assistance Document*, dated February 2016, and comments made by EPA in the *Technical Support Document* attached to the 120-day letter.

With respect to the emissions modeling parameter, EPA noted in the 120-day letter that "continuous emissions monitoring systems (CEMS) data provide acceptable historical emissions information when it is available, and that these data are available for many electric generating units." *Id.* at p. 12. EPA further noted in its technical analysis that LDEQ used "normalized hourly emissions and actual stack temperature and exit velocity from the CEMS for 2012-2014" and that Sierra Club's modeling used "hourly emissions data measured by the CEMS from CAMD (2012-2014) and constant stack temperature and exit velocity." *Id.* at p. 12. Concerning the source characterization modeling parameter, EPA stated:

> Sierra Club modeled constant exit flowrate and temperature based on 100% load. No consideration was given of facility operation at less than 100% load. Stack parameters such as exit flow rate and temperature are typically lower than full load, having the effect of reducing pollutant dispersion and increasing predicted air quality impacts. In addition, no consideration was given to building or structure downwash. Downwash effects typically increase predicted concentrations near the facility. The state identified International Paper located 14 km north of the Dolet Hills facility with annual emissions exceeding 1,300 tpy as the only other large nearby emission source. However, no sources other than Dolet Hills were included in the modeling performed by the Sierra Club or the state.

Id. at p. 11 (Emphasis added).

In its supplemental modeling analysis, AEP included more accurate information for three specific categories: (1) stack parameters, (2) emissions data, and (3) effects of downwash. With respect to stack parameters, AEP reviewed the flat stack exit temperature and exit velocity used by Sierra Club and concluded that these were arbitrarily low. Data collected by AEP reveals temperatures above $200^{O}F$ and an exit velocity greater than 90 ft/sec at the low-end of full load operating conditions. In contrast, Sierra Club used a temperature of $161^{O}F$ and an exit velocity of about 85 ft/sec. With respect to emissions data, AEP used CEMS data for the Dolet Hills Power Station including, heat input (MMBtu/hr) data, flowrate (scfh), and hourly SO_2 emissions data (lb/hr) that was reported to the USEPA Clean Air Markets Division ("CAMD"). In addition to these parameters, the temperature data collected by the CEMS (but not reported to CAMD based on the 40 CFR Part 75 reporting protocols developed by CAMD) was used to adjust the flow data back into actual flow units and the hourly temperature input required by AERMOD. The data was processed on a parameter basis in which flowrate was adjusted back to actual hourly stack conditions using the temperature data for concurrent hour for which the exit velocity was

being calculated. This hourly data was then passed through multiple checks to ensure the validity of the data. Sierra Club's first modeling analysis only used one year of data to estimate the required three-year average.

The Sierra Club report claims that updating the inventory to reflect load change and including a proper downwash analysis will increase the predicted impacts. *See*, Dolet Hills Power Station report, dated August 9, 2015, p. 4. Based on AEP's review, this statement is generally not correct for emission sources like the Dolet Hills Power Station with a stack that is significantly taller than surrounding structures. For this reason, AEP included proper downwash in its air quality model and estimated emissions based on actual operating data, which better reflects the dispersion of SO_2 emissions in a given hour. Startup conditions were also reflected in the inventory used by AEP based on available information.

The ambient air modeling report prepared by AEP, entitled *Air Quality Modeling Technical Note, Dolet Hills Power Station, Mansfield, Louisiana*, is attached to these comments in Attachment 1. The modeling files have also been provided to EPA Region 6 personnel for further review and examination. The final refined modeling simulation shows that the highest concentration due to *all* sources and the background concentration is 171.0 $\mu g/m^3$, which is below the 1-hour SO_2 NAAQS of 196.5 $\mu g/m^3$. As discussed in Comment 3 below, a seasonal hourly background concentration ranging from 4.88 $\mu g/m^3$ to 24.85 $\mu g/m^3$ was used for this analysis. However, the AEP modeling still demonstrates compliance with the 1-hour SO_2 NAAQS if the higher background concentration used by Sierra Club and LDEQ (31.4 $\mu g/m^3$) is used.

Cleco believes that EPA should use the attached modeling report in lieu of prior reports submitted by Sierra Club and the LDEQ. As discussed, the AEP modeling analysis used more accurate information for stack parameters and emissions data for the Dolet Hills Power Station as well as the effects of downwash, and included emissions of the paper mill. Cleco further asserts that based on this modeling information alone, EPA should classify DeSoto Parish as "attainment" in the final SO_2 NAAQS designation. As discussed below, this modeling result comports much closer to the monitoring data that has been attained for this area in recent months.

2. Emissions from International Paper's Mansfield Mill do not contribute to concentration gradients around the Dolet Hills Power Station or to the south of this facility as asserted in EPA's 120-day letter. Because such emissions have now been adequately considered in AEP's modeling analysis, an attainment designation is appropriate.

The *Technical Analysis for DeSoto* discussed the fact that neither Sierra Club nor the state's modeling included emissions from International Paper's Mansfield Mill. EPA further speculated that "when winds are out of the north and resulting in some of the highest values modeled around Dolet Hills, the IP source would be upwind and could contribute to concentration gradients around Dolet Hills and to the south of Dolet Hills." *Id.* at p. 10. Based on this observation and the proximity between the Dolet Hills Power Station and the Mansfield Mill (~14 kilometers), EPA concluded that "it is likely that the source causes concentration gradients

that extend to area impacted by Dolet Hills with some of the higher modeled values that are near the standard." *Id.* EPA concluded its analysis of the proposed jurisdictional boundaries by stating:

> The EPA believes that the IP facility has reported emissions that are large enough such that if they were explicitly modeled in accordance with the Modeling TAD would likely be shown to contribute to the ambient concentrations that have already been modeled to show violations, or near violation, of the NAAQS. Inclusion of IP emissions may likely increase modeled values just below the standard to exceedance levels. Therefore, our intended area includes portions of DeSoto Parish that include the area of modeled exceedances and near exceedances as well as the IP facility because of its likely contribution to the modeled ambient concentrations resulting in additional potential NAAQS violations if IP were included in the modeling.
>
> The EPA believes that our intended nonattainment area, consisting of the area around Dolet Hills and including Cleco, is comprised of clearly defined boundaries, and we find these boundaries to be a suitably clear basis for defining our intended nonattainment area.

Id. at p. 18 (Emphasis added). As discussed in the prior section, the air modeling performed by AEP included the utility and the paper mill, and confirms compliance with the 1-hour SO_2 NAAQS. AEP's modeling further reveals that SO_2 emissions from the Mansfield Mill do *not* contribute to the concentration gradients near the Dolet Hills facility or to the south of the facility.

With respect to modeled emissions for the paper mill, the analysis used a conservative representative estimate for the maximum hourly SO_2 emissions rate for Power Boilers No. 1 and 2. These rates were developed from a statistical evaluation of the hourly SO_2 CEMS data (lb/MMBtu) for the period 2012-2014. The factors were then multiplied by the maximum heat input of each boiler to obtain the maximum actual SO_2 emissions rates. All other SO_2 emissions sources were modeled using the maximum permitted emission rates. As noted in the report, atypical operating scenarios were excluded from the modeling analysis since they are not representativeness of typical mill operation and are not expected to coincide with the other conservative modeling inputs. To address EPA's comment related to assumptions made in the LDEQ and Sierra Club modeling, hourly exit flowrate/velocity data was developed in the refined modeling analysis.

As discussed, the refined modeling analysis shows that the highest concentration due to *both* sources plus monitored background is below the 1-hour SO_2 NAAQS. In addition, the contribution of emissions sources at the Mansfield Mill to the total modeled concentration is extremely low (approximately 0.4 $\mu g/m^3$). This refutes any supposition in EPA's 120-day letter that the Mansfield Mill "could contribute to concentration gradients around Dolet Hills and to the south of Dolet Hills" in any meaningful way. Instead, the refined modeling shows that the highest concentrations associated with the Mansfield Mill sources are at the facility boundary

and drop off significantly with distance from mill property. None of these concentrations exceed the 1-hour SO_2 NAAQS (196.5 $\mu g/m^3$).

As discussed, AEP's refined modeling analysis considers the paper mill and is based on accurate and conservative emissions data from this facility. Based on this analysis, EPA should classify all of DeSoto Parish as "attainment" in the final SO_2 NAAQS designation.

3. A more representative background concentration should be used for the DeSoto Parish area modeling analyses than what was used by the Sierra Club or LDEQ.

Ambient air quality data is typically used to represent the contribution of non-modeled sources to the total ambient air pollutant concentrations for a NAAQS analysis. With respect to background concentration, EPA's *Technical Analysis for DeSoto* references that 31.4 d $\mu g/m^3$ was used by the LDEQ and Sierra Club in their respective modeling analyses. This was purportedly based on the "99th percentile of the annual distribution of daily maximum 1-hour concentrations averaged across 2011-2013 for the Bossier Parish monitor – the lowest measured background concentration in the state." *Id.* at p. 14. Thus, the Sierra Club and LDEQ analysis used monitored data from a monitor located in Shreveport, Louisiana approximately 54 kilometers north of the Dolet Hill Power Station.

Although EPA states in the TAD that the Shreveport monitor has "the lowest measured background concentration in the state," this monitor is the most representative monitor available for any modeling analysis and likely conservative. The Mansfield Mill and Dolet Hills facilities are surrounded by rural land use generally consisting of agricultural and undeveloped forested and grassland areas, whereas the Shreveport monitor is in a more urban/developed area consisting of commercial and compact residential land uses. A wind rose of the Shreveport meteorological data indicates winds in the region are predominantly from the south. Thus, SO_2 are likely transported from both the power station and the paper mill toward the Shreveport monitor. Therefore the use of this monitor may result in some double counting of emissions in the analysis. For these reasons, the Shreveport monitor should be conservative to represent background in the vicinity of the Mansfield Mill and Dolet Hills.

EPA's recommends a tiered approach for adding monitored background concentrations (representing non-modeled sources) in the NAAQS analysis. As noted in the *Technical Analysis for DeSoto,* the first tier approach is conservatively based on adding the monitored design value (3-year average 99th percentile daily 1-hour maximum concentration) to the modeled design value. The second tier uses a temporally varying approach, based on combining the monitored concentrations, by hour of day and season, with the hourly modeling results. The total hourly modeled plus monitored concentrations are then used to determine the design concentration for comparison to the NAAQS. These computations are all done within AERMOD.

Rather than conservatively adding the modeled design concentration with the monitored design concentration for this analysis, the second tier refinement should be used. Under this approach, the ambient background concentration should be combined with modeled concentrations on a seasonal hour-of-day basis in accordance with EPA guidance as outlined in

the TAD. For the AEP analysis, the ambient background concentrations were updated based on 2013-2015 data for the Shreveport monitor. The Sierra Club and LDEQ purportedly used data from 2011-2013; however, it appears that only data from 2013 was used since the Shreveport monitor was not in operation in 2011 and 2012.

Based on the foregoing, Cleco believes EPA should accept the seasonal hourly background concentrations developed by AECOM/International Paper ranging from 4.88 $\mu g/m^3$ to 24.85 $\mu g/m^3$ based on 2013-2015 data for the Shreveport monitor. This background concentration is based on an actual three years of data (not an extrapolation of one year) and a more recent period. As discussed in Comment 1above, the AEP modeling still demonstrates compliance with the 1-hour SO_2 NAAQS if the higher background concentration used by Sierra Club and LDEQ (31.4 $\mu g/m^3$) is used. Nevertheless, the use of the lower background concentration is justified in this instance.

4. EPA accepted similar air modeling in Arkansas that used better site data and more closely adhered to EPA's technical assistance document. For consistency, EPA should also accept the attached modeling report that demonstrates attainment with the SO_2 NAAQS.

In the February 11, 2016 notification by EPA to the Governor of Arkansas of its designation intention for Jefferson County, Arkansas, a Technical Assistance Document (TAD) was included which discussed the reasoning behind EPA's intention. This discussion mainly focused on the White Bluff Steam Electric Station ("White Bluff") and the dispersion modeling of the plant by both the Arkansas Department of Environmental Quality ("ADEQ") and Sierra Club. EPA wrote in the paragraph titled *Other Relevant Information* (page 18 of the TAD) that it had identified multiple errors in stack parameters, as well as less-refined modeling approaches as compared with the state's submittal (*e.g.,* variable stack velocity and temperature were not included). With respect to the less-refined modeling approaches, EPA stated:

> Sierra Club also did not include the additional refinement of variable stack parameters, as allowed by the modeling TAD, and was not as representative of daily operations when compared with the state's analysis. The state's modeling was determined to follow the modeling TAD more closely, and is more representative of actual operation conditions at White Bluff station. Therefore, our intended unclassifiable/attainment designation for Jefferson County is based on the state's analysis.

Letter from Ron Curry to Gov. Asa Hutchinson, attaching *Technical Analysis for Jefferson County Arkansas Area*, dated Feb. 11, 2016, p. 18.

Similar to the modeling conducted by ADEQ, the AEP modeling analysis for Desoto Parish used variable stack parameters as allowed by EPA's modeling TAD. Sierra Club's modeling of Desoto Parish, like its modeling of Jefferson County, Arkansas, did *not* use variable stack parameters and, therefore, is not as representative of daily operations as AEP's modeling. Therefore, as it did in Arkansas, EPA should base its designation of Desoto Parish on the

modeling that is *more* representative of actual operating conditions, which is the attached modeling analysis submitted on behalf of the Dolet Hills Power Station.

5. EPA should consider the existing ambient air monitoring data that exists for the DeSoto Parish area that was located using EPA-accepted protocol. This monitoring data confirms that the 1-hour SO_2 NAAQS has been satisfied for a representative period. At a minimum, the monitoring data demonstrates that not enough data exists to classify the area as nonattainment.

On July 8, 2015, representatives of Cleco, EPA and the LDEQ met to discuss issues related to the SO_2 NAAQS designation for DeSoto Parish, including the installation of a SO_2 ambient air monitoring system to characterize the quality of the ambient air near the Dolet Hills Power Station. On August 19, 2015, Cleco submitted a report to the LDEQ and EPA entitled, *Siting for Source-Specific SO_2 Ambient Monitoring for Dolet Hills Power Station."* Cleco's consultant used a "normalized design value" (NDV) approach to determine an acceptable SO_2 monitoring location based on EPA's guidance document entitled, *SO_2 NAAQS Designations Source-Oriented Monitoring Technical Assistance Document*, dated December 2013.

Cleco subsequently installed a SO_2 ambient air monitoring system based on the results of the siting analysis prepared by CB&I. The LDEQ referenced the use of data from the ambient air monitor in its SO_2 NAAQS recommendation letter to EPA, dated September 18, 2015, and noted that the "data provided by the new monitoring station will allow for an accurate characterization of air quality nearest the source of SO_2 without ambiguity." *See*, p. 3 of *DeSoto Support Document* attached to LDEQ letter to EPA. Representatives of LDEQ have reviewed the data collection and processing for this ambient air monitor since installation.

CB&I submitted a *SO_2 Ambient Monitoring Quarterly Report* to the LDEQ on February 26, 2016 that provided monitoring data from October 23, 2015 through January 31, 2016. Thus, the statement by EPA on page 8 of the technical analysis that "there are no SO_2 air quality monitors in DeSoto Parish" is not accurate. All data collected for this period demonstrates compliance with the 1-hour SO_2 NAAQS. The report dated February 26, 2016 noted that the highest daily maximum one-hour concentration from October 23, 2015 through January 31, 2016 was 32.6 parts per billion (ppb). The average daily maximum 1-hour concentration for this period was only 3.5 ppb and the 99th percentile daily maximum 1-hour concentration was 25.6 ppb. The ambient air monitoring report prepared by CB&I are attached to these comments in Attachment 2.

The above monitoring data, based on an ambient air monitoring station (properly sited using EPA's source-oriented monitoring technical assistance document) demonstrates that *actual* SO_2 concentrations are well below the 1-hour SO_2 NAAQS. This information further supports the modeling analysis prepared by AEP that shows the design value to be below the standard. Cleco believes that the use of both sets of data justify an "attainment" designation. At a minimum, Cleco believes the SO_2 monitoring data for this representative period justifies a designation of "unclassifiable/attainment." EPA should not make a premature and unwarranted

nonattainment designation for DeSoto Parish due to the consent decree deadline based on overly-conservative and faulty analysis provided in 2015.

The final Data Requirements Rule (and many other EPA documents) states that an area will be designated as "unclassifiable" if the EPA has determined "that sufficient information has not yet been identified to support an attainment or nonattainment designation." *See,* 80 Fed. Reg. 51,084. In this case, we believe there is sufficient information for EPA to make a final designation of "attainment" or "unclassifiable/attainment." Likewise, in light of conflicting modeling reports, there is not enough information for EPA to make a definitive determination that any part of DeSoto is not attaining the standard. EPA is clearly authorized to consider this monitoring data and should do so in this case: (1) because it was properly located using EPA guidance documents, (2) because it demonstrates *monitored* attainment with the SO_2 NAAQS, and (3) because it substantiates AEP's modeling analysis which also confirms compliance with the standard.

6. Based on the available information, EPA should allow more time to evaluate the monitoring data before designating any part of DeSoto Parish as nonattainment. Sufficient data does not exist to make a conclusion that the DeSoto Parish area is not meeting the 1-hour SO_2 NAAQS.

With respect to NAAQS, the federal Clean Air Act defines an area as "nonattainment" as "any areas that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) that national primary or secondary ambient air quality standard for the pollutant." *See,* 42 U.S.C.§ 7501(2) and 42 U.S.C.§ 7407(d)(1). Implicit in this statutory definition is the criteria that enough significant data exists (in the case of the 1-hour SO_2 NAAQS through either monitoring or modeling) for EPA to conclude that an ambient air quality standard has been or is being violated in a particular geographic area. With respect to DeSoto Parish, Cleco believes that EPA has not presented enough data in the 120-day letter to designate any portion of the parish as nonattainment. Rather, this data more properly leads to a designation of "unclassifiable" if LDEQ's air modeling analysis is disregarded by EPA.

However, based on the AEP modeling results that use significantly more accurate emissions and source parameter data for the Dolet Hills Power Station and International Paper's Mansfield Mill, enough data exists to designate DeSoto Parish as "attainment," which is defined in the federal Clean Air Act as "any area … that meets the national primary or secondary ambient air quality standard for the pollutant." *Id.* This higher-quality modeling analysis is further supported by recent ambient monitoring data that confirms that the anticipated highest-modeled area near the Dolet Hills facility is well within the 1-hour SO_2 NAAQS. EPA clearly has the authority to consider this data (hence, the non-mandatory solicitation for public comments by EPA in the March 1, 2016 Federal Register notice) before a final designation is made. Based on this clear and overwhelming information, Cleco urges the EPA to designate DeSoto Parish as attainment by July 2, 2016. At a minimum, the data justifies a recommendation of "unclassifiable/attainment" for this geographic region.

Summary

For the reasons discussed in these comments and as presented in the attached modeling and monitoring reports, Cleco requests that EPA make a final designation of "attainment" for all of DeSoto Parish. The air modeling conducted by AEP demonstrates that SO_2 emissions from the major SO_2 sources located in this region meets the 1-hour SO_2 NAAQS. This conclusion is further supported by data from the properly-located ambient air monitoring station currently operating in DeSoto Parish.

We appreciate your review of these comments and look forward to EPA's written response. If you have any questions, I can be reached at (318)484-7718.

Respectfully submitted,

Bill Matthews
Director – Environmental Policy and Planning

Attachments

cc: Mark Hansen, U.S. EPA Region 6
Tegan Treadaway, LDEQ Air Permits Division

Attachment 1

Attachment 2