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VIA E-MAIL & FEDERAL EXPRESS

Mr. Rick Barrett
Air Permits Section (6PD-R)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
Barrett.richard@epa.gov

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AIR PLANNING SEC
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Re: Request for Extension of Comment Period;
Approval and Promulgation of Implementation Plans; Texas; Revisions to Rules and
Regulations for Control of Air Pollution; Permitting of Grandfathered and Electing Electric
Generating Facilities
(Docket EPA-R06-OAR-2005-TR-0031)

Dear Mr. Barrett:

On October 19, 2010, EPA Region 6 proposed to partially approve and partially disapprove a Texas State Implementation Plan ("SIP") revision that implements a mandate from the Texas Legislature that has already achieved reductions in NO_x and SO₂ in Texas. 75 Fed. Reg. 24235 (Oct. 19, 2010). EPA proposes to partially disapprove one integral portion of the proposed revision, despite expressly stating that the portion at issue does not interfere with attainment or maintenance of the relevant NAAQS, nor cause or contribute to any increase in PSD increments. *Id* at 64,238 and 64,240.

Luminant requests an extension of the comment period by at least 30 days to thoroughly review EPA's proposal and to provide meaningful comments to the agency. This SIP revision was submitted to EPA over ten years ago. EPA's October 2010 proposal is the first mention of the agency's intention to disapprove any of the proposed SIP revision. In light of the length of time it took EPA to review the pending revisions and because of the importance of this rule as applied to Luminant and other sources in Texas, a 30-day extension is more than reasonable. Allowing this limited additional time will not prejudice any party interested in the approved rule, nor should it unreasonably delay EPA's issuance of its final decision, and it should improve the decision-making process by allowing for more thoughtful participation in this process by interested persons.

Please notify me directly of your decision on this request and do not hesitate to contact me if you have any questions.

Sincerely,

William A. Moore