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October 27, 2010

By E-Mail & First Class Mail

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

Re: 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, 75 Fed. Reg. 64,235 (Oct. 19, 2010)
Docket No. EPA-R06-OAR-2005-TR-0031
Request for Extension of Comment Period

Dear Mr. Barrett:

EPA Region 6 has proposed to partially approve and partially disapprove the above-referenced, decade-old proposed Texas State Implementation Plan (SIP) revision that has achieved significant reductions in SO₂ and NO_x from Electric Generating Facilities (EGFs). The permitting program at issue was initially implemented by the Texas Commission on Environmental Quality (TCEQ) in response to a mandate from the Texas Legislature over 10 years ago. EPA is proposing this disapproval even though EPA acknowledges that the program at issue has not interfered with attainment or maintenance of any NAAQS and has not caused or contributed to any increase in any PSD increments. *See* 75 Fed. Reg. 64,238, 64,240.

The Gulf Coast Lignite Coalition (GCLC) requests an extension of the comment period by at least 30 days in order to adequately respond to the EPA's proposal, review EPA's data, and gather additional data and information to support its comments. GCLC is a coalition of entities that own or operate lignite and coal-fired power plants in Texas, Louisiana, and Mississippi. In Texas alone, these industries represent over 10 billion dollars in annual expenditures and over 33,000 permanent jobs.

A comment period extension for this matter will not prejudice any party interested in the proposed rule, will not unreasonably delay EPA's issuance of its final decision, and will improve the decisionmaking process by allowing for more thoughtful participation by interested parties. GCLC believes this extension request is appropriate, particularly given the fact that EPA has not previously indicated its intention to disapprove this proposed SIP revision.

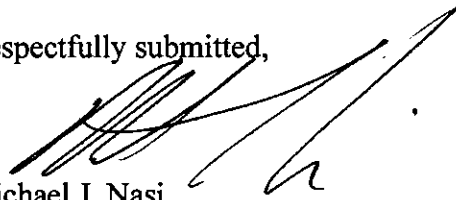
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Please provide me directly with notice of your decision on this request, and please feel free to contact me with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael J. Nasi', written over the closing text.

Michael J. Nasi
Counsel for the Gulf Coast Lignite Coalition

cc: American Electric Power
Luminant
Optim Energy LP
San Miguel Electric Cooperative, Inc.
The North American Coal Corporation