



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

July 1, 2016

Heather McTeer Toney, Regional Administrator
Environmental Protection Agency
Region IV Offices
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Ms. Toney:

Pursuant to the Data Requirements Rule (DRR) for the 1-Hour Sulfur Dioxide Primary National Ambient Air Quality Standard (NAAQS), EPA-HQ-OAR-2013-0711, published on August 21, 2015, each air agency submitted a list to EPA by January 15, 2016 identifying all sources within its jurisdiction that had SO₂ emissions that exceeded the 2,000 tons per year (tpy) annual threshold during the most recent year for which emissions data were available. This list was provided by ADEM to EPA on January 14, 2016. After further communication, EPA responded to ADEM in a letter dated March 22, 2016 with a request that information be provided for five additional sources which met the 2,000 tpy threshold in the most recent year (2014).

Additionally, in accordance with the DRR, the State of Alabama is providing information on how SO₂ will be characterized for those sources included in the initial list provided on January 14, 2016 as well as for those which EPA requested addition information. This communication satisfies the requirements laid out in the DRR which are due to EPA by July 1, 2016.

As part of this submittal, the first two tables below provide the method of characterization for sources choosing to perform air quality modeling versus those choosing to collect ambient monitoring data. Modeling/Monitoring protocols are being submitted electronically with this package. The last table provides documentation for those sources which are proposing to limit emissions below the 2,000 tpy threshold, or which are taking alternative enforceable limits to exempt characterization under the DRR. Documentation on those sources is also being provided electronically as part of this package.



Table 1: SO₂ DRR Air Quality Monitoring Characterization

| Facility Number | County | Company Name | Facility Name | Status |
|------------------------|---------------|---------------------------------|----------------------|---|
| 411-0008 | Shelby | Lhoist North America of Alabama | Montevallo Plant | Protocol Submitted to EPA on April 28, 2016 |

Table 2: SO₂ DRR Air Quality Modeling Characterization

| Facility Number | County | Company Name | Facility Name | Status |
|------------------------|---------------|-------------------------------|--------------------------|-------------------|
| 411-0005 | Shelby | Alabama Power Company | EC Gaston | Protocol Included |
| 503-1001 | Mobile | Alabama Power Company | Barry | Protocol Included |
| 210-0005 | Pike | Sanders Lead Co | | Protocol Included |
| 502-0007 | Escambia | Escambia Operating Company | Big Escambia Creek Plant | Protocol Included |
| 108-0001 | Washington | PowerSouth Energy Cooperative | Lowman | Protocol Included |
| 201-0001 | Autauga | International Paper Company | Prattville Mill | Protocol Included |
| 712-0010 | Morgan | Ascend Performance Materials | Decatur Plant | Protocol Included |
| 211-0003 | Russell | Continental Carbon Company | Phenix City Plant | Protocol Included |

Table 3: SO2 DRR Enforceable Restriction Documentation

| Facility Number | County | Company Name | Facility Name | Status |
|------------------------|---------------|---------------------------------|----------------------|--------------------|
| 405-0001 | Greene | Alabama Power Company | Greene Co | Consent Decree |
| 307-0002 | Etowah | Alabama Power Company | Gadsden | Consent Decree |
| 414-0001 | Walker | Alabama Power Company | Gorgas | 2 Units Shut Down |
| 701-0010 | Colbert | Tennessee Valley Authority | Colbert | Coal Shutdown |
| 705-0008 | Jackson | Tennessee Valley Authority | Widows Creek | Plant Shutdown |
| 503-5009 | Mobile | Akzo Nobel Functional Chemicals | LeMoyne Site | Permit Restriction |

Electronic copies of all protocols and associated documentation are included as part of this package, and a hardcopy of this letter including a disk containing all protocols and/or documentation will follow. If you have any questions, please contact Leigh Bacon of my staff at 334-270-5689 or via email at lbb@adem.alabama.gov.

Sincerely,



Ronald W. Gore, Chief
Air Division
Alabama Department of Environmental Management

cc: Beverly Banister, Director
Air, Pesticides and Toxics Management Division