



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

# DEPARTMENT OF NATURAL RESOURCES

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JUN 28 2016

Mr. Mark Hague  
Regional Administrator  
U.S. EPA, Region VII  
11201 Renner Boulevard  
Lenexa, KS 66219

Dear Mr. Hague:

The Missouri Department of Natural Resources' Air Pollution Control Program (air program) hereby submits this letter to provide the U.S. Environmental Protection Agency (EPA) with detailed evaluation specifics for sources subject to the requirements of the EPA Data Requirements Rule (DRR) for the 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS). The air program submitted the list of affected sources to the EPA on January 15, 2016. Per the DRR<sup>1</sup>, the air program is required to notify EPA by July 1, 2016, of how the air quality around each identified source will be characterized: through new ambient air quality monitors, through air quality modeling, or through permanent and enforceable emission limitations of SO<sub>2</sub> to below 2,000 tons per year (tpy) by January 13, 2017. These evaluation methods will ultimately be used to determine each area's attainment status of the 2010 1-hour SO<sub>2</sub> NAAQS. The enclosed table (Attachment 1) details the air quality characterization method to be used for each affected source. For sources that will have federally enforceable emission limitations by January 13, 2017, the table provides a description of the requirements and intended emission limits.

To comply with 40 CFR §51.1203, this submittal also includes the following required information:

- 1) *Modeling Protocol for Characterization of Air Quality* for sources identified in the table that will characterize SO<sub>2</sub> concentrations through air quality modeling (Attachment 2), and
- 2) Missouri's *2016 Monitoring Network Plan* for sources identified in the table that will characterize SO<sub>2</sub> concentrations through ambient air quality monitoring (Attachment 3). Please note the attached monitoring network plan is the public inspection version. The final monitoring network plan will be posted on our webpage here: <http://dnr.mo.gov/env/apcp/docs/2016monitoringnetworkplan.pdf>

<sup>1</sup> 40 CFR 51.1203, Final Data Requirements Rule for the 2010 1-hour Sulfur Dioxide Primary National Ambient Air Quality Standard, published in Federal Register on August 21, 2015.

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Thank you for your attention to this matter. If you have any questions regarding this submittal, please contact Ms. Darcy Bybee with the Missouri Department of Natural Resources' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kyra L. Moore  
Director

KLM:clc

Enclosures:

Attachment 1: Table of Sources Affected by DRR and Method of Air Quality Characterization  
Attachment 2: Modeling Protocol for Characterization of Air Quality  
Attachment 3: Missouri's 2016 Monitoring Network Plan

c: Missouri Air Conservation Commission  
File# 2010-SO2-5-DRR

Attachment 1

Table of Sources Affected by DRR and Method of Air Quality Characterization

FID	Plant Name	Method of Air Quality Characterization		Federally enforceable requirement to limit SO <sub>2</sub> emissions to under 2,000 tpy	Description
		Monitoring	Modeling		
071-0003	AMEREN MISSOURI-LABADIE ENERGY CENTER	X			
143-0004	NEW MADRID POWER PLANT-MARSTON	X			
175-0001	THOMAS HILL ENERGY CENTER POWER DIVISION-THOMAS HILL		X		
189-0010	AMEREN MISSOURI-MERAMEC ENERGY CENTER		X		
083-0001	KANSAS CITY POWER AND LIGHT CO (KCP AND L)-MONTROSE GENERATING STATION		X		
201-0017	SIKESTON POWER STATION		X		
097-0001	EMPIRE DISTRICT ELECTRIC CO-ASBURY PLANT		X		
143-0008	NORANDA ALUMINUM INC-NEW MADRID	X			
019-0004	UNIVERSITY OF MISSOURI (MU)- COLUMBIA POWER PLANT			X	Facility-wide limit enforceable through Title V permit
095-0031	KCP AND L - GREATER MO OPERATIONS-SIBLEY GENERATING STATION		X		
186-0001	MISSISSIPPI LIME COMPANY-STE. GENEVIEVE			X	Facility-wide limit enforceable through Title V permit
077-0039	CITY UTILITIES OF SPRINGFIELD -JOHN TWITTY ENERGY CENTER		X		
510-0003	ANHEUSER-BUSCH INC-ST. LOUIS			X	Reduction of potential to emit through equipment shutdown or fuel switch. Post-2016 PTE less than 2,000 tons per year.
127-0001	BASF CORPORATION-HANNIBAL PLANT			X	Reduction of potential to emit through equipment shutdown or fuel switch. Post-2016 PTE less than 2,000 tons per year.
095-0050	INDEPENDENCE POWER AND LIGHT-BLUE VALLEY STATION			X	Reduction of potential to emit through equipment shutdown or fuel switch. Post-2016 PTE less than 2,000 tons per year.
093-0009	DOE RUN –BUICK RESOURCE RECYCLING FACILITY	X			