



January 12, 2017

**FILE**

Mr. Carl Daly  
Director, Air Program  
U.S. EPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202

Re: Modeling Submittals for DRR

Dear Mr. Daly:

The North Dakota Department of Health (Department) is submitting to you in this package our required dispersion modeling analyses to satisfy the requirements for the SO<sub>2</sub> NAAQS Data Requirement Rule (DRR) for sources characterized by modeling in North Dakota.

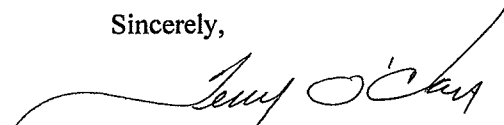
Four sources in North Dakota have chosen to characterize their SO<sub>2</sub> impacts using air quality modeling according to the DRR, namely: the Minnkota Power Cooperative Milton R. Young Station (MRY), Montana-Dakota Utilities Co. R.M. Heskett Station, Basin Electric Power Cooperative Antelope Valley Station (AVS), and Dakota Gasification Company Great Plains Synfuels Plant (GPSP). Because AVS and GPSP are located adjacent to each other, their modeling runs were performed together in the same analysis. Consequently, we are submitting three analyses, one for MRY, one for Heskett, and one for both AVS and GPSP.

These modeling analyses followed EPA guidance and the State's approved modeling protocol, and have been carried out in close cooperation with your office, in particular Rebecca Matichuk and Adam Clark. This package contains modeling reports and computer input and output files for use in your review for NAAQS designations for North Dakota. There are three modeling reports for the three analyses. Computer files have been provided each on a different medium: MRY's on a CD, AVS' and GPSP's on a DVD, and Heskett's on a flash drive.

According to the DRR, these modeling analyses were to be submitted to EPA by January 13, 2017. We believe they contain the information needed for your staff to make SO<sub>2</sub> attainment designations by the December 2017 deadline. As stated in the reports, these analyses demonstrate that the areas surrounding these SO<sub>2</sub> sources comply with the 1-hour SO<sub>2</sub> NAAQS and justify designating these areas as in attainment for the 1-hour SO<sub>2</sub> NAAQS.

If you or your staff have any questions or need any additional information to process these analyses, feel free to get in touch with me or my staff at (701)328-5188. For detailed modeling questions, please contact Rob White of my staff.

Sincerely,



Terry L. O'Clair, P.E.  
Director  
Division of Air Quality

TLO/RJW:saj

Enc: