



STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
GARY C. RIKARD, EXECUTIVE DIRECTOR

January 12, 2017

Heather McTeer Toney
Regional Administrator
U.S. Environmental Protection Agency
Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Re: Sulfur Dioxide Data Requirements Rule

Dear Ms. McTeer Toney:

On June 25, 2016 the Mississippi Department of Environmental Quality (MDEQ) submitted, in accordance with 40 CFR Part 51.1203, the characterization pathways to characterize air quality in the respective areas of emission sources that exceed the actual annual emissions threshold of 2,000 tons/year for 2014. As required, this letter, and attachments, serves as our formal submission of specific information required by the Data Requirements Rule (DRR) related to each source.

County	Facility	Characterization Pathway
Lamar	South Mississippi Electric Power Association, R.D. Morrow Plant	Area Designated Attainment See EPA letter attached Dated Feb 16, 2016
Harrison	Mississippi Power Company, Plant Jack Watson	Federally Enforceable Emission Limit
Jackson	Mississippi Power Company, Plant Victor Daniel	Air Quality Modeling
Harrison	The Chemours Company FC, LLC, (Formerly DuPont-Delisle)	Federally Enforceable Emission Limit
Rankin	Pursue Energy Corporation, Thomasville Gas Plant	Facility Shut Down
Choctaw	Choctaw Generation, LLP, Red Hills Generation Facility	Air Quality Modeling

South Mississippi Electric Power Association, R.D. Morrow Plant was a "consent decree source" in the second round of designations for the SO₂ standard. EPA designated Lamar County as unclassifiable/attainment based upon air dispersion modeling analysis, thus satisfying evaluation requirements for the R.D. Morrow Plant.

Mississippi Power Company, Plant Jack Watson received federally-enforceable permit emission limits that reduced their potential SO₂ emissions to less than the 2,000 tons/year annual DRR threshold. Plant Watson underwent a fuel switch from coal to natural gas, completed in April of 2015, eliminating coal as a potential fuel. Attached is Title V Operating Permit 1020-00055 modified on December 29, 2016.

The Chemours Company FC, LLC (Formerly DuPont-Delisle) received federally-enforceable permit emission limits that reduced their potential SO₂ emissions to less than the 2,000 tons/year annual DRR threshold. Chemours completed a fuel switch from coal to natural gas in 2016, removing coal as a potential fuel. Attached is PSD Permit to Construct Air Emissions Equipment 1020-00115 issued on January 10, 2017.

Pursue Energy Corporation ceased operation of the **Thomasville Gas Plant** on September 13, 2016. Attached is documentation to verify the shutdown and termination of Title V Operating Permit 2380-00036 on January 10, 2017.

Modeling reports for both **Plant Victor Daniel** and **Red Hills Generation Facility** were compiled and are included with this letter. Air Quality Modeling was conducted following procedures consistent with the August 2016 "SO₂ NAAQS Designations Modeling Technical Assistance Document". Choctaw Generation LLP - Red Hills Generation Facility was modeled to characterize air quality in Choctaw County, and Mississippi Power Company - Plant Victor Daniel was modeled to characterize air quality in Jackson County. Both facilities were modeled using three years of actual hourly emissions from 2012-2014 plus the ambient background concentration. The modeled design concentration for both facilities was calculated using AERMOD Version 15161 (released June 30, 2015) and reflects the three year average of the 99th percentile ranked peak daily 1-hour SO₂ concentration.

For Choctaw County the modeling results for the 1-hour SO₂ NAAQS, based on the sum of the modeled design concentration from the Red Hill Generating Facility plus the ambient background concentration, was 43% of the 1-hour SO₂ NAAQS. It is therefore anticipated that no annual reporting will be required to demonstrate ongoing attainment of the 2010 SO₂ NAAQS.

For Jackson County the modeling results for the 1-hour SO₂ NAAQS, based on the sum of the modeled design concentration from the Plant Victor Daniel Facility plus the ambient background concentration, was 75% of the 1-hour SO₂ NAAQS. However, the two coal fired emissions units are both currently equipped with a wet flue gas desulfurization (FGD) systems for control of SO₂ emissions. The modeling was conducted using uncontrolled SO₂ emission rates which are not reflective of current operations with the FGD system in place, and are

highly conservative. It is therefore anticipated that annual reporting required to demonstrate ongoing attainment of the 2010 SO2 NAAQS will be limited to providing verification of the decrease in actual emissions, and no further modeling will be warranted.

Please let me know if there is additional information you require to satisfy MDEQ's response to the DRR. If you have any questions, please feel free to contact me or Keith Head at 601-961-5577.

Sincerely,



Dallas Baker

Chief, Air Division

Mississippi Department of Environmental Quality

Attachments.

Cc: Beverly Banister
Scott Davis