



Alabama Department of Environmental Management  
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December 15, 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 (SO<sub>2</sub>) 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 SO<sub>2</sub> 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 2014.

Further, in accordance with the DRR, the State of Alabama provided information on how SO<sub>2</sub> would be characterized for those sources included in the initial list as well as those that EPA requested additional information for. This was submitted to EPA on July 1, 2016.

Two of the facilities, Alabama Power Company- Plant Gorgas (414-0001), and Akzo Nobel Functional Chemicals (503-5009), were originally listed in the July 1, 2016 letter as sources taking enforceable restrictions to meet the DRR. Since the July correspondence, however, both companies have requested to change their SO<sub>2</sub> characterization from taking enforceable restrictions to performing air quality modeling, and both are proposing to model nearby facilities to ensure compliance with the 1 hour SO<sub>2</sub> NAAQS. Finally, both facilities have indicated their intent to meet the established modeling submittal deadline of January 13, 2017 to comply with the DRR requirements.



If you have any questions regarding these changes, please contact Leigh Bacon of my staff at 334-270-5689 or via email at [lbb@adem.alabama.gov](mailto:lbb@adem.alabama.gov).

Sincerely,

A handwritten signature in cursive script that reads "Ronald W. Gore".

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

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