STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
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January 11, 2017

Mr. Leiran Biton
United States Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA
02109-3912

Dear Mr. Biton,

Please find attached an Air Dispersion Modeling Results document that was prepared by the Maine Department of Environmental Protection (MEDEP) for the FPL Wyman Station (Wyman Station) facility, located on Cousins Island in Yarmouth, Maine. Specifically, these modeling results are being submitted in response to the March 17, 2016 USEPA Region I letter to MEDEP regarding the agency's determination that Wyman Station should be included as a listed source for the Data Requirements Rule (DRR) for the 1-Hour Sulfur Dioxide (SO_2) Primary National Ambient Air Quality Standard.

As you know, the DRR requires characterization of ambient air quality around emission sources emitting 2,000 or more tons per year (TPY) of SO_2 in the most recent year for which emissions data are available. It is important to note that Wyman Station did not have emissions greater than this 2,000 TPY threshold in the most recent years of available data (2014 and 2015).

Under the DRR, states have flexibility in characterizing air quality using air quality modeling of actual facility emissions or using appropriately sited new/existing ambient monitors, as appropriate. USEPA has explicitly provided two designation timeframes: 2017, when based on air quality modeling and 2020, when based on ambient monitoring.

All states were required to submit lists for those sources emitting 2,000 TPY or more by January 15, 2016. On January 13, 2016 MEDEP submitted a letter to USEPA Region I stating the following: *"Based on the most recent year of quality-assured annual emissions data submitted to the USEPA (2014), Maine does not have any individual sources with SO_2 emissions that exceed 2,000 tons per year. Maine does not anticipate that any of its regulated sources will emit in excess of 2,000 tons of SO_2 in the foreseeable future. Therefore, it is Maine's position that no modeling or monitoring be required for any sources in our jurisdiction."*

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On March 17, 2016 USEPA Region I responded to MEDEP: *"Though total annual SO_2 emissions from Wyman have declined in recent years, it appears that Wyman's operation from month to month is highly variable, and that may continue into the future..... For example, in 2015, Wyman had 22 days with SO_2 emissions greater than 40 tons per day. Therefore, the USEPA believes that it is appropriate and necessary to characterize William F Wyman under the Data Requirements Rule."*

The DRR required that by July 1, 2016, for each source identified, the state must indicate if they will monitor, model or establish a reduced federally enforceable permitted SO_2 emissions limit. Regardless of the option chosen, the DRR requires that both monitoring and modeling protocols were to be submitted by July 1, 2016.

On June 29, 2016, MEDEP sent a letter to inform USEPA that Wyman Station had chosen the air dispersion modeling option, rather than selecting either of the remaining options: to perform ambient monitoring or to establish a reduced federally enforceable permitted SO_2 emissions limit.

Attached to the June 29, 2016 letter, MEDEP submitted an air dispersion modeling protocol which provided in-depth modeling discussions and data of the following:

- Model and Option Selection
- Units and Physical Stack Attributes
- Source of Emissions Data
- Modeling Domain and Receptor Grid
- Terrain Data
- Meteorological Data
- Buildings and Structures
- Ambient Background Concentrations

Furthermore, the DRR requires that if the air dispersion modeling option is selected to demonstrate compliance, that the final modeling analyses and results shall be submitted to USEPA no later than January 13, 2017.

After several iterations of correspondence to resolve any questions regarding the modeling protocol, MEDEP received agreement from USEPA that the protocol was acceptable. MEDEP then conducted an air dispersion modeling analysis using USEPA-approved models and modeling techniques in a manner consistent with the June 2016 modeling protocol.

Enclosed, please find for your review, MEDEP's Air Dispersion Modeling Results document which demonstrates that Wyman Station is in compliance with the 1-hour SO_2 NAAQS, using procedures and methodologies established in the approved modeling protocol.

If you have any questions or comments regarding the content of the Air Dispersion Modeling Protocol, please contact Kevin Ostrowski at (207) 287-2424 or kevin.ostrowski@maine.gov.

Sincerely,

Marc Allen Robert Cone

Marc Allen Robert Cone, P.E.
Director, Bureau of Air Quality

Enclosure: Air Dispersion Modeling Results CD-ROM

cc via email: David Conroy, USEPA Region I
Ida McDonnell, USEPA Region I
Kevin Washington, Florida Power & Light
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