

LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

December 7, 2016

MR SCOTT DAVIS
AIR PLANNING AND IMPLEMENTATION BRANCH
US EPA
REGION 4
61 FORSYTH STREET
ATLANTA, GA 30303-8960



Dear Mr. Davis:

On October 5, 2015, the Department issued to Alabama Power's Plant Greene County Air Permit No. 405-0001-X012 to allow the modification of Units 1 and 2 from coal-fired boilers to natural gas-fired boilers. Proviso 22 of this permit states, "The Units associated with this permit shall burn natural gas only." As such, the potential SO₂ emissions (full capacity, year-round) from these units are now a total of about 13 tons per year.

Additionally, on June 25, 2015, a Modified Consent Decree between EPA and APC was filed in the United States District Court for the Northern District of Alabama, Southern Division. In Case No. 2:01-cv-00152-VEH, it is stated, "Beginning January 1, 2017, APC shall combust only natural gas in Plant Greene County Unit 1 and Unit 2."

Given that natural gas is the only fuel allowed to be burned in Units 1 and 2 and the resulting SO₂ emissions are two orders of magnitude lower than the 2000 TPY threshold set forth in EPA's Data Requirements Rule for the 2010 1-hour SO₂ Primary NAAQS (DRR), APC's Greene County facility is not required to perform any modeling or monitoring required by the DRR.

If you have any questions or comments concerning this matter, please contact Amy Graham at (334) 271-7867.

Sincerely,

A handwritten signature in black ink that reads "Ronald W. Gore".

Ronald W. Gore, Chief
Air Division

RWG/AEG

cc: Mr. Mark Steele, APC

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)