



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

January 15, 2016

Mr. Jared Blumenfeld, Regional Administrator
U.S. Environmental Protection Agency, Region IX
Mail Code ORA-1
75 Hawthorne Street
San Francisco, CA 94105

Re: Arizona SO₂ Information for the Data Requirements Rule

Dear Mr. ~~Blumenfeld~~^{Jared}:

On August 10, 2015, the U.S. Environmental Protection Agency finalized requirements for air agencies to monitor or model ambient sulfur dioxide (SO₂) levels in areas with large sources of SO₂ emissions to help implement the 1-hour SO₂ National Air Ambient Quality Standard (NAAQS).

This final rule establishes that, at a minimum, air agencies must characterize air quality around sources that emit 2,000 tons per year (tpy) or more of SO₂. An air agency may avoid the requirement for air quality characterization near a source by adopting enforceable emission limits that ensure the source will not emit more than 2,000 tpy of SO₂.

The Arizona Department of Environmental Quality (ADEQ) has identified five sources that will need to be addressed for the data requirements rule. Those sources include two copper smelters and three coal-fired power plants. The names of the sources along with information regarding SO₂ emissions and upcoming controls are presented in the table below.

Lhoist North America-Nelson Lime Plant, TEP Irvington, and Salt River Project - Coronado Generating Station were included in EPA's 2011 NEI as sources that generate near or over 2,000 tpy of SO₂. However, these sources are not included in the table below for the following reasons:

- Lhoist North America-Nelson Lime Plant generated 1,997 tons of SO₂ in 2014 and is expected to generate emissions well below the limit when the EPA regional haze FIP is implemented, which will require them to shift to lower sulfur content fuels.
- TEP Irvington generated 1,084 tons of SO₂ in 2014. Due to the regional haze issues, they are shifting to lower sulfur content fuels, which will result in lower SO₂ emissions.
- Salt River Project - Coronado Generating Station generated 908 tons of SO₂ in 2014, which is well below the 2,000 tpy limit, and no further change in emissions is anticipated.

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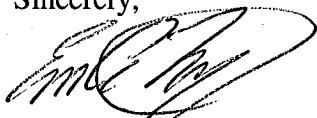
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Arizona Facilities with 2,000 tpy or more of SO₂ Emissions

| FACILITY NAME | 2014 SO₂ (TONS) | UPCOMING CONTROLS | EMISSIONS AFTER NEW CONTROLS |
|---|-----------------------------------|---|--|
| Asarco Hayden Smelter | 17,432 | 3 new converters, improved primary and secondary capture system, new tertiary capture system | On implementation of proposed changes, emissions will reduce to about 3,500 tpy |
| Freeport Miami Smelter | 4,505 | Replace Isa furnace with bigger one, reconfigure roofline to capture fugitive emissions and capture/route these emissions to aisle caustic scrubber | On implementation of proposed changes, emissions will reduce to 552 tpy |
| APS - Cholla | 3,806 | Unit 2 expected to shut down in April 2016. Units 1, 3 and 4 conversion to natural gas in 2025 | Unit 2 will permanently shut down in April 2016 resulting in emissions reduction by about 1,000 tpy. Facility-wide SO ₂ emissions likely to drop to below 10 tpy after natural gas switch in 2025 |
| Tucson Electric Power Co.- Springerville Generating Station | 6,221 | No changes are planned at the facility | No change in emissions is anticipated |
| Arizona Electric Power Cooperative - Apache Generating Station | 4,811 | As part of the BART process the following changes will occur: Unit 2 will switch from coal to natural gas. Unit 2 will install SNCR control technology. | Based on AEPCO's BART analysis, the changes being made to Unit 2 and Unit 3 will result in SO ₂ emission reductions of approximately 1,000 tpy facility-wide. Expected installation in May 2017. |

If you should have any questions regarding this letter, please contact me at (602) 771-2308.

Sincerely,



Eric C. Massey, Director
Air Quality Division
Arizona Department of Environmental Quality