

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of Air Resources, Climate Change & Energy, Assistant Commissioner  
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JAN - 6 2016

Ms. Judith Enck  
Regional Administrator  
United States Environmental Protection Agency  
Region 2  
290 Broadway, 26th Floor  
New York, New York 10007-1866

Dear Ms. Enck:

DEC hereby submits, for consideration by the United States Environmental Protection Agency (EPA), the list of large sulfur dioxide (SO<sub>2</sub>) emitting sources in New York State where air quality will be characterized pursuant to the final rule entitled "Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)" (80 FR 51052, September 21, 2015). This list must, at a minimum, include sources with SO<sub>2</sub> emissions greater than 2,000 tons per year (tpy).

DEC has determined that the following emission sources in New York exceeded the 2,000 tpy threshold in 2014, the most recent year for which data is available. Therefore, this list constitutes the final list of sources to be characterized under the Data Requirements Rule:

- Eastman Business Park, whose utility infrastructure is powered by Recycled Energy Development (RED) (Rochester, NY)
- Alcoa (Massena, NY)
- Cayuga Generating Station (Lansing, NY)
- Lafarge North America (Ravena, NY).

Additionally, DEC notes that the analysis required by the final Data Requirements Rule may not capture all of the areas and emission sources that could cause nonattainment. Given that the NAAQS is based on 1-hour concentrations, it is plausible that sources with low annual emissions but high hourly emissions could cause attainment problems. In order to address this issue, DEC plans to characterize certain, yet-to-be-determined, sources with high hourly emissions that emit less than the 2,000 tpy threshold.

It is also plausible that areas with a high concentration of SO<sub>2</sub> sources may have attainment problems even though no single source would cause high ambient levels of SO<sub>2</sub>. As a result, DEC plans to investigate a portion of the New York City metropolitan area along the East River where combustion sources with the potential for elevated SO<sub>2</sub> levels are located.



Department of  
Environmental  
Conservation

Should you have any questions regarding this submission, please do not hesitate to contact Mr. Steven Flint, Assistant Director of DEC's Division of Air Resources, at (518) 402-8452.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Jared Snyder", with a long horizontal flourish extending to the right.

J. Jared Snyder  
Assistant Commissioner for  
Air Resources, Climate Change and Energy

c: D. Shaw  
R. Ruvo, EPA Region 2