

July 1, 2016

Ms. Monica Morales
Acting Director Air Program
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

RE: Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS

Dear Ms. Morales,

In accordance with §51.1203, the Wyoming Department of Environmental Quality, Air Quality Division (Division), is submitting notification of air quality characterization for applicable Sulfur Dioxide (SO₂) sources located within the State. The Division tasked regulated facilities with the responsibility to comply with the Sulfur Dioxide Data Requirements Rule. The Division requested that all applicable sources make a pathway determination to further characterize air quality.

On August 21, 2015, the EPA promulgated a rule directing state air agencies to provide data to characterize ambient air quality in areas with large sources of sulfur dioxide (SO₂) emissions. *See* Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS), 80 Fed. Reg. 51052 (August 21, 2015) (“Data Requirements Rule” or “Rule”). As noted in the preamble, the Rule set forth a process and timetable by which state air agencies must characterize air quality through modeling and/or air quality monitoring and submit the data to EPA.

In accordance with §51.1202 and §51.1203 of the Data Requirements Rule, the Division immediately embarked on the process to characterize peak 1-hour SO₂ concentrations. Accordingly, the Division was able to submit its list of applicable SO₂ sources to the EPA on January 13, 2016. In a letter dated March 21, 2016, EPA Region 8 concurred with Wyoming’s list of sources. EPA Region 8 also stated:

For sources that an air agency decides to evaluate through air quality modeling, the DRR requires the air agency to submit to the EPA Regional Administrator a modeling protocol by July 1, 2016, and the completed modeling analysis by January 13, 2017. For sources that an air agency decides to evaluate through ambient monitoring, the air agency will need to identify approximate sites to characterize peak 1-hour SO₂ concentrations, and may need to relocate existing monitors or install new monitors at such sites. As

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further required under the DRR, the air agency must submit information about monitoring sites to the EPA Regional Administrator by July 1, 2016, as part of its annual monitoring network plan and in accordance with the EPA's monitoring requirements specified in 40 CFR part 58. The air agency must also ensure that ambient monitors will be operational by January 1, 2017.

Letter from Carl Daly, Director Air Program, EPA Region 8, to Nancy E. Vehr, Administrator Air Quality Division, Wyoming Department of Environmental Quality, dated March 21, 2016, page 2.

Over the course of the past 10 months, as work has been underway to prepare the required July 1st submittals, the Division has discussed technical issues with EPA Region 8 staff on numerous occasions. In fact, the Division initiated modeling discussions with the Region even before publication of the final rule in the Federal Register. The Division also submitted modeling protocols to EPA Region 8 prior to receiving EPA Region 8's concurrence letter in March 2016. After technical discussions and feedback from EPA Region 8, the Division submitted revised modeling protocols. EPA Region 8 has expressed to Division staff that it will be early fall before the Region will be able to answer whether those revised protocols are satisfactory. As a result, the impacted sources are in the position of having to pursue a dual modeling and monitoring pathway while awaiting clarity from EPA Region 8.

In addition to engaging in early modeling discussions, the Division also engaged in monitoring discussions with EPA Region 8 long before EPA's final promulgation of the Rule. In February 2016, the Division invited EPA Region 8 to review initial monitoring plans and attend monitoring visits. The Division appreciates that the Region was able to accompany the Division on some of those siting visits. As a result, in April 2016, the Division was able to notify sources of additional revisions that they needed to provide to include these monitoring plans in the Division's 2016 Network Plan. On May 11, 2016, the Division placed its 2016 Network Plan out for public comment and also emailed a copy to EPA Region 8. The Division did not receive any comments during the public comment period. Therefore, on June 16, 2016, the Division submitted the final 2016 Network Plan to EPA Region 8. The 2016 Network Plan includes specific SO₂ ambient monitoring network information for those sources that have elected the monitoring pathway to characterize SO₂ concentrations for purposes of the Data Requirements Rule.

The information below outlines the sources and the method of characterization.

Basin Electric – Laramie River Station

Basin Electric has elected to pursue the modeling pathway to characterize the SO₂ concentrations at the Laramie River Station. The initial modeling protocol was reviewed by Division, sent to Region 8, and received by Region 8 on May 9, 2016. Comments on the protocol were received by Division from Region 8 via e-mail on June 28, 2016.

Basin Electric – Dry Fork Station

This facility is part of the Campbell County Electric Generating Unit (EGU) Group. The Campbell County EGU Group has chosen to characterize SO₂ by modeling. On February 16, 2016, the initial modeling protocol was received by the Division and transmitted to EPA Region 8. Comments on that version of the protocol were provided to the Division via e-mail from Rebecca Matichuk on March 1, 2016. Region 8 received an updated version of the protocol on April 28, 2016. The Division received additional comments on the protocol from Region 8 on June 20, 2016. The Division submitted a second modeling protocol revision (dated June 27, 2016) to Region 8 on June 28, 2016.

Black Hills Power – Neil Simpson II Power Plant

This facility is part of the Campbell County Electric Generating Unit (EGU) Group. The Campbell County EGU Group has chosen to characterize SO₂ by modeling. On February 16, 2016, the initial modeling protocol was received by the Division and transmitted to EPA Region 8. Comments on that version of the protocol were provided to the Division via e-mail from Rebecca Matichuk on March 1, 2016. Region 8 received an updated version of the protocol on April 28, 2016. The Division received additional comments on the protocol from Region 8 on June 20, 2016. The Division submitted a second modeling protocol revision (dated June 27, 2016) to Region 8 on June 28, 2016.

Black Hills Power – WyGen I Power Plant

This facility is part of the Campbell County Electric Generating Unit (EGU) Group. The Campbell County EGU Group has chosen to characterize SO₂ by modeling. On February 16, 2016, the initial modeling protocol was received by the Division and transmitted to EPA Region 8. Comments on that version of the protocol were provided to the Division via e-mail from Rebecca Matichuk on March 1, 2016. Region 8 received an updated version of the protocol on April 28, 2016. The Division received additional comments on the protocol from Region 8 on June 20, 2016. The Division submitted a second modeling protocol revision (dated June 27, 2016) to Region 8 on June 28, 2016.

Black Hills Power – WyGen II Power Plant

This facility is part of the Campbell County Electric Generating Unit (EGU) Group. The Campbell County EGU Group has chosen to characterize SO₂ by modeling. On February 16, 2016, the initial modeling protocol was received by the Division and transmitted to EPA Region 8. Comments on that version of the protocol were provided to the Division via e-mail from Rebecca Matichuk on March 1, 2016. Region 8 received an updated version of the protocol on April 28, 2016. The Division received additional comments on the protocol from Region 8 on June 20, 2016. The Division submitted a second modeling protocol revision (dated June 27, 2016) to Region 8 on June 28, 2016.

Black Hills Power – WyGen III Power Plant

This facility is part of the Campbell County Electric Generating Unit (EGU) Group. The Campbell County EGU Group has chosen to characterize SO₂ by modeling. On February 16, 2016, the initial modeling protocol was received by the Division and transmitted to EPA Region 8. Comments on that version of the protocol were provided to the Division via e-mail from Rebecca Matichuk on March 1, 2016. Region 8 received an updated version of the protocol on April 28, 2016. The Division received additional comments on the protocol from Region 8 on June 20, 2016. The Division submitted a second modeling protocol revision (dated June 27, 2016) to Region 8 on June 28, 2016.

Burlington Resources – Lost Cabin Gas Plant

Burlington Resources has elected to pursue the monitoring pathway to characterize SO₂ concentrations at the Lost Cabin Gas Plant. The Division's Monitoring Section has worked in cooperation with Burlington Resources and EPA Region 8 to identify the suitable location for their SO₂ DRR ambient monitoring network. The Lost Cabin Gas Plant proposed monitoring location was given verbal approval by EPA Region 8. Specific SO₂ ambient monitoring network information can be found in the Division's 2016 Network Plan.

PacifiCorp – Dave Johnston Power Plant

PacifiCorp has elected to pursue both the modeling and monitoring pathways while awaiting modeling characterization of SO₂ concentrations at the Dave Johnston Power Plant. The Monitoring Section has worked in cooperation with PacifiCorp and EPA Region 8 to identify the suitable locations for their SO₂ DRR ambient monitoring network. The potential monitoring location was given verbal approval by EPA Region 8 monitoring staff. However, the implementation of the ambient network will likely not be certain until after the due date of this letter. Therefore, the Division is notifying EPA that PacifiCorp will remain on both pathways until a modeling protocol is approved or disapproved.

PacifiCorp – Naughton Power Plant

PacifiCorp will pursue the modeling pathway for the Naughton Power Plant. On March 28, 2016, the initial modeling protocol was reviewed by the Division and transmitted to Region 8. Comments on this protocol were provided to the Division via e-mail from Rebecca Matichuk on April 6, 2016. The Division received and transmitted a revised protocol to Region 8 on June 9, 2016. Region 8's e-mail comments on the protocol were received by the Division on June 2, 2016.

PacifiCorp – Jim Bridger Power Plant

PacifiCorp has elected to pursue both the modeling and monitoring pathways while awaiting modeling characterization of SO₂ concentrations at the Jim Bridger Power Plant. The

Monitoring Section has worked in cooperation with PacifiCorp and EPA Region 8 to identify the suitable locations for their SO₂ DRR ambient monitoring network. The Jim Bridger Power Plant proposed monitoring location was given verbal approval by EPA Region 8. However, implementation of the ambient network will likely not be certain until after the due date of the letter. Therefore, the Division is notifying EPA that PacifiCorp will remain on both pathways until a modeling protocol is approved or disapproved.

PacifiCorp – WyoDak Power Plant

This facility is part of the Campbell County Electric Generating Unit (EGU) Group. The Campbell County EGU Group has chosen to characterize SO₂ by modeling. On February 16, 2016, the initial modeling protocol was received by the Division and transmitted to EPA Region 8. Comments on that version of the protocol were provided to the Division via e-mail from Rebecca Matichuk on March 1, 2016. Region 8 received an updated version of the protocol on April 28, 2016. The Division received additional comments on the protocol from Region 8 on June 20, 2016. The Division submitted a second modeling protocol revision (dated June 27, 2016) to Region 8 on June 28, 2016.

Sinclair Wyoming Refining Company – Sinclair Refinery

Sinclair Wyoming Refining Company has elected to pursue the monitoring pathway to characterize SO₂ concentrations at the Sinclair Refinery. The Division's Monitoring Section has worked in cooperation with EPA Region 8 and Sinclair Wyoming Refining Company to identify the suitable locations for their SO₂ DRR ambient monitoring network. The selected monitoring location was given verbal approval by EPA Region 8 monitoring staff. Specific SO₂ ambient monitoring network information can be found in the Division's 2016 Network Plan.

Solvay Chemicals – Solvay Green River

This facility is part of the Trona Group in Sweetwater County. The Trona Group has chosen to characterize SO₂ by monitoring. The Monitoring Section has worked in cooperation with the Trona Group and EPA Region 8 to identify the suitable locations for their SO₂ DRR ambient monitoring network. Verbal approval for the monitoring site locations was given by EPA Region 8 monitoring staff. Specific SO₂ ambient monitoring network information can be found in the Division's 2016 Network Plan.

TATA Chemical (Soda Ash) Partners – Green River Works

This facility is part of the Trona Group in Sweetwater County. The Trona Group has chosen to characterize SO₂ by monitoring. The Monitoring Section has worked in cooperation with the Trona Group and EPA Region 8 to identify the suitable locations for their SO₂ DRR ambient monitoring network. Verbal approval for the monitoring site locations was given by EPA

Region 8 monitoring staff. Specific SO₂ ambient monitoring network information can be found in the Division's 2016 Network Plan.

Tronox Alkali Wyoming Corporation – Granger

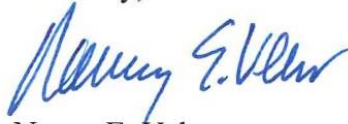
This facility is part of the Trona Group in Sweetwater County. The Trona Group has chosen to characterize SO₂ by monitoring. The Monitoring Section has worked in cooperation with the Trona Group and EPA Region 8 to identify the suitable locations for their SO₂ DRR ambient monitoring network. Verbal approval for the monitoring site locations was given by EPA Region 8 monitoring staff. Specific SO₂ ambient monitoring network information can be found in the Division's 2016 Network Plan.

Tronox Alkali Wyoming Corporation – Westvaco

This facility is part of the Trona Group in Sweetwater County. The Trona Group has chosen to characterize SO₂ by monitoring. The Monitoring Section has worked in cooperation with the Trona Group and EPA Region 8 to identify the suitable locations for their SO₂ DRR ambient monitoring network. Verbal approval for the monitoring site locations was given by EPA Region 8 monitoring staff. Specific SO₂ ambient monitoring network information can be found in the Division's 2016 Network Plan.

Please feel free to contact Cara Keslar at 307-777-8684, or Amber Potts at 307-777-2489 should you have any questions regarding this submittal.

Sincerely,



Nancy E. Vehr
Administrator
Air Quality Division

NV/ap

Cc: Amber Potts, Rule Development Section, AQD
Cara Keslar, Monitoring Section, AQD