

Overview of SIP Development for 1-Hour SO₂ Standard

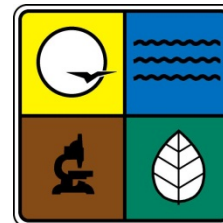
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Air Pollution Control Program

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Air Program Advisory Forum



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NATURAL RESOURCES

Boundary Designation Status

- Submitted recommendation in June 2011
 - Nonattainment: Portions of Greene, Jackson, Jefferson Counties with violating monitors
 - Unclassifiable: Rest of state
- EPA's schedule for acting on recommendation
 - 120-day letters in Feb 2012
 - Final designations in June 2012

SIP Overview

- 110 (a) SIP (infrastructure SIP) due in June 2013
 - Unclassifiable areas
 - Based on modeling demonstrating attainment and maintenance of standard
- Attainment SIP due in Feb 2014
 - Nonattainment areas
 - Based on monitored and modeled compliance

Infrastructure SIP Requirements

- Traditional elements demonstrating authority/resources to enforce & implement standard
- New elements for 1-hour SO₂ standard
 - Enforceable emission limits/controls
 - Timetables for compliance
 - Testing/reporting to assure compliance
 - Refined modeling to show SIP-adopted limits/controls will attain 1-hour NAAQS

Modeling/Analysis Overview

- Prioritizing sources to model
 - Refined modeling of 100 tpy SO₂ sources (actual emissions)
 - Qualitative/screening for smaller sources
- Verifying emission rates, model inputs for all sources
- Working with EPA to fine-tune approach and modeling protocol

Baseline Assessment

- Recent & planned operational changes/limits modeled to assess compliance
- Based on max allowable emissions rate
 - Permit limits or
 - If no permit limit, max potential of unit with highest sulfur content fuel
- Will work with facilities on case-by-case basis

Control Strategy Evaluation

- Compliance modeling for multiple scenarios as needed
- Control options
 - Fuel types
 - Operational limits
 - Emission rate limits
 - Control devices

SIP Development Target Dates

Info request to 100 tpy emitters	December 2011
Verification of modeling inputs and control discussions	December 2011- December 2012
Refined modeling complete (baseline and control runs)	December 2012
Public notice of plan	March 2013
Public hearing of plan	April 2013
Adoption of plan	May 2013
Submit plan to EPA	June 2013

Enforceability Options

- Rulemaking (would need to start soon for 18-month process)
- Consent agreement
- Construction permit (limited cases only)
- Requesting EPA to allow operating permit

SO₂ Attainment Date

- Attainment date of 2017
- All controls must be in place prior to 2017 per 3 year averaging requirements
- Depending on noncompliance magnitude, sources should plan for implementing some/all controls in 2014/2015

Startup Shutdown Malfunction Proposal

- Initially model w/o SSM
- Establish criteria for evaluating SSM
 - Peak $\text{SO}_2 \geq X\%$ of standard
 - Number of SSM events recorded since 2005
- Separate modeling criteria expected for units that routinely startup or shutdown
- Will work with EPA on final approach

Atypical Events

- Must clearly define intermittent and/or emergency status by subcategory – dependent on facility function/evaluation
- Separate subcategory criteria for peaking units, baseload units, etc.
- Dual-fueled units – need documentation & 5 yr usage data for secondary fuel

What should a facility be doing now?

- Help verify modeling inputs by responding to information request – Raise issues now
- Begin considering control options (for implementation in 2014/2015)
- Feedback on best way to establish enforceable limits for your facility
- Communicate with us early and often

Role of SO₂ Workgroup?

- Outreach to small/medium impacted sources
- Updates via Advisory Forum

Questions & Further Discussion



*Division of Environmental Quality
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SO₂ Issues & Questions

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