



Susan Mosier, MD, Secretary

Department of Health & Environment

Sam Brownback, Governor

January 14, 2016

Mark Hague, Regional Administrator  
 USEPA, Region VII  
 11201 Renner Boulevard  
 Lenexa, KS 66219

RE: Data Requirement Rule (DRR) for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary Ambient Air Quality Standard (NAAQS)

Dear Administrator Hague:

In accordance with the final Data Requirements Rule (80 FR 51052), KDHE is required to submit a list to the EPA by January 15, 2016, that identifies all sources within its jurisdiction which have SO<sub>2</sub> emissions exceeding the 2,000 tons per year (tpy) annual threshold during the most recent year for which emissions data for that source are available. These sources, along with their total SO<sub>2</sub> emissions for the latest available inventory year (2014), are listed below in Table 1.

**Table 1. Facilities in Kansas with greater than 2,000 tons SO<sub>2</sub> emitted in the latest available emissions inventory**

Kansas facility	Source ID	2014 facility tons SO <sub>2</sub>	Comments
Kansas City BPU - Nearman	2090008	5,333	Dry scrubber scheduled to be installed ~ December 2016
KCP&L - La Cygne	1070005	12,639	Based on 2010 emissions minus estimated SO <sub>2</sub> change in Dec 2010 revised scrubber project permit application (C-4096 rev), 2016 value will be 2,370 tons
Westar Energy - Tecumseh	1770030	4,545	<i>Unit 8/10 was permanently closed December 31, 2015.</i>

Please note: The two Kansas City BPU-Quindaro units are not included in Table 1 purposefully. These coal units were converted to firing natural gas (April 2015) and SO<sub>2</sub> emissions have dropped precipitously since then (see Table 2). This facility's emissions are now below 5 tons per year, which is far below the 2,000 ton per year reporting threshold.

**Table 2. Kansas City BPU-Quindaro SO<sub>2</sub> emissions (tons)**

BPU Unit	2015 Q1	2015 Q2	2015 Q3
Unit 1	340.3	11	0.5
Unit 2	410.4	88.9	0.4
Quarter total	750.7	99.9	0.9

Also note that for the Westar Energy - Tecumseh facility, although the 2014 emissions totaled 4,545 tons, this included data from the 7/9 and 8/10 units combined. Unit 8/10 was retired December 31, 2015, leaving only the 7/9 unit still in operation, with emissions below the 2,000 ton per year reporting threshold (see Table 3).

**Table 3. Annual SO<sub>2</sub> emissions for Westar Energy - Tecumseh Unit 7/9 for years 2010-2014**

Year	tons SO <sub>2</sub>
2010	1,722
2011	1,580
2012	1,265
2013	1,845
2014	1,478
<i>Average</i>	1,578

KDHE staff is aware the DRR may require an air quality characterization of the respective areas where these facilities are located by July 1, 2016. KDHE looks forward to discussing with EPA regional staff to determine if and/or how these characterizations should be accomplished (e.g., modeling or monitoring data).

An e-mailed electronic copy in exact duplicate of this hard copy to EPA Region VII Air Planning staff has been sent, as well. Should you have questions regarding this submission, or require further information, please contact Tom Gross, KDHE Bureau of Air Monitoring and Planning section, at 785-296-1692 or at [tgross@kdheks.gov](mailto:tgross@kdheks.gov).

Sincerely,



John Mitchell  
Director, Division of Environment

Cc: David Peter, EPA R7  
Lachala Kemp, EPA R7  
Rick Brunetti, KDHE  
Tom Gross, KDHE