



Minnesota Pollution Control Agency

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January 8, 2016

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U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF REGIONAL ADMINISTRATOR

Dr. Susan Hedman, Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Mail Code: R-19J
Chicago, IL 60604

RE: State of Minnesota Data Submittal for the Sulfur Dioxide Data Requirements Rule

Dear Dr. Hedman:

Pursuant to the "Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)" (Data Requirements Rule) final rule (40 CFR Part 51.1203(a)), the Minnesota Pollution Control Agency (MPCA) hereby submits the following list of applicable SO₂ sources in the State of Minnesota.

The table below identifies six sources in Minnesota that have actual emissions of SO₂ of 2,000 tons or greater in 2014, the most recent year for which the MPCA has available annual SO₂ emissions data for stationary sources. Table 1 comprises the facilities for which Minnesota will conduct air quality characterization under one of the proposed pathways provided in the Data Requirements Rule.

Table 1 - 2014 SO₂ Emissions Greater than 2,000 tons

Facility Name	City	County	2014 SO ₂ Emissions (tons)
Xcel Energy - Sherburne Generating Plant	Becker, MN	Sherburne	11,459
Minnesota Power - Boswell Energy Center	Cohasset, MN	Itasca	4,576
Xcel Energy - Black Dog	Burnsville, MN	Dakota	3,228
Minnesota Power - Taconite Harbor Energy Center	Schroeder, MN	Cook	2,944
Otter Tail Power Co - Hoot Lake Plant	Fergus Falls, MN	Otter Tail	2,422
Northshore Mining - Silver Bay	Silver Bay, MN	Lake	2,369

Though applicability of the Data Requirements Rule is determined via the most recently available emissions inventory data (2014 for Minnesota), the MPCA did review SO₂ emissions from 2012 and 2013, in addition to 2014, in compiling its list of facilities. No facility in Minnesota besides those already selected for Data Requirements Rule assessment emitted 2,000 tons per year of SO₂ or greater in 2012-2014.

Attached to this letter, the MPCA is providing a list of facilities in Minnesota with 2014 SO₂ emissions of approximately 1,000 tons or higher, along with a map showing the approximate locations of the facilities. The attachments, though not required by the Data Requirements Rule, provide a cluster screening that further supports the MPCA's selection of only sources with SO₂ emissions greater than 2,000 tons per year for air quality characterization.

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The MPCA is already working with the facilities identified in Table 1 to address additional rule requirements. In accordance with 40 CFR 51.103(b), the MPCA will notify the U.S. Environmental Protection Agency by July 1, 2016, whether it will assess the facilities in Table 1 via ambient air quality monitoring, modeling, or provide federally enforceable emissions limitations by January 13, 2017, that limit emissions of applicable sources to less than 2,000 tons per year of SO₂.

If you have any questions or comments about this submission, please contact Melissa Andersen Kuskie of my staff at 651-757-2512 or melissa.kuskie@state.mn.us.

Sincerely,



J. David Thornton
Assistant Commissioner

JDT/MK:je

Attachments

Attachment 1 – Cluster Screening

Minnesota 2014 SO₂ emissions

SOURCE_NAME	City	County	2014 SO ₂ Emissions (tons)
Xcel Energy - Sherburne Generating Plant	Becker, MN	Sherburne	11,459
Minnesota Power Inc - Boswell Energy Ctr	Cohasset, MN	Itasca	4,576
Xcel Energy - Black Dog	Burnsville, MN	Dakota	3,228
Minnesota Power - Taconite Harbor Energy Center	Schroeder, MN	Cook	2,944
Otter Tail Power Co - Hoot Lake Plant	Fergus Falls, MN	Otter Tail	2,422
Northshore Mining - Silver Bay	Silver Bay, MN	Lake	2,369
Gopher Resource LLC	Eagan, MN	Dakota	1,770
Xcel Energy - Allen S King Generating	Bayport, MN	Washington	1,609
US Steel Corp - Minntac	Mountain Iron, MN	St. Louis	1,371
American Crystal Sugar - East Grand Forks	East Grand Forks, MN	Polk	1,046
United Taconite LLC - Fairlane Plant	Forbes, MN	St. Louis	972

(sources in yellow will be characterized in accordance with the Data Requirements Rule)

The two facilities nearest one another in the above table are the Xcel Energy Black Dog power plant (Black Dog) in Burnsville (Dakota County), Minnesota, and the Gopher Resources facility in Eagan (Dakota County), Minnesota (See Figure 1, Attachment 2), whose SO₂ emissions in 2014 were approximately 1,770 tons. The facilities are located approximately 10.6 km from one another (Figure 2, Attachment 2).

The Minnesota Pollution Control Agency (MPCA) believes it unnecessary to require an air quality assessment from the Gopher Resources facility for two reasons. First, though the facility is relatively nearby the Data Requirements Rule-subject Black Dog, SO₂ emissions from Black Dog have decreased considerably since 2014, and are expected to be nearly negligible post 2015, as the Black Dog plant ceased burning coal for fuel in April 2015 and now relies on natural gas for fuel. Because 2015 emissions data (that would be expected to show SO₂ emissions well below the 2,000 ton threshold of the Data Requirements Rule) were unavailable at the time of this submittal, Black Dog is included on the list of rule-subject facilities as a result of its 2014 emissions. The MPCA believes future SO₂ emissions from Black Dog will be insignificant, and will have no impact on SO₂ concentrations near the Gopher Resources facility. Second, the MPCA is aware that Gopher Resources has entered into a Consent Agreement and Final Order (CAFO) with the U.S. Environmental Protection Agency (EPA) Regional 5 wherein it agreed to complete an “early compliance” Supplemental Environmental Project to limit sulfur dioxide emissions to address the 1-hour SO₂ NAAQS. Because the Gopher Resources facility is subject to EPA-approved SO₂ emissions limits, and because the nearest Data Requirements Rule-subject source currently operates with negligible SO₂ emissions, the MPCA believes no further analysis is required for the Gopher Resources facility.

Attachment 2 – Cluster Assessment Maps

Figure 1 - Map of facilities with SO₂ emissions of 970 tons or greater in 2014

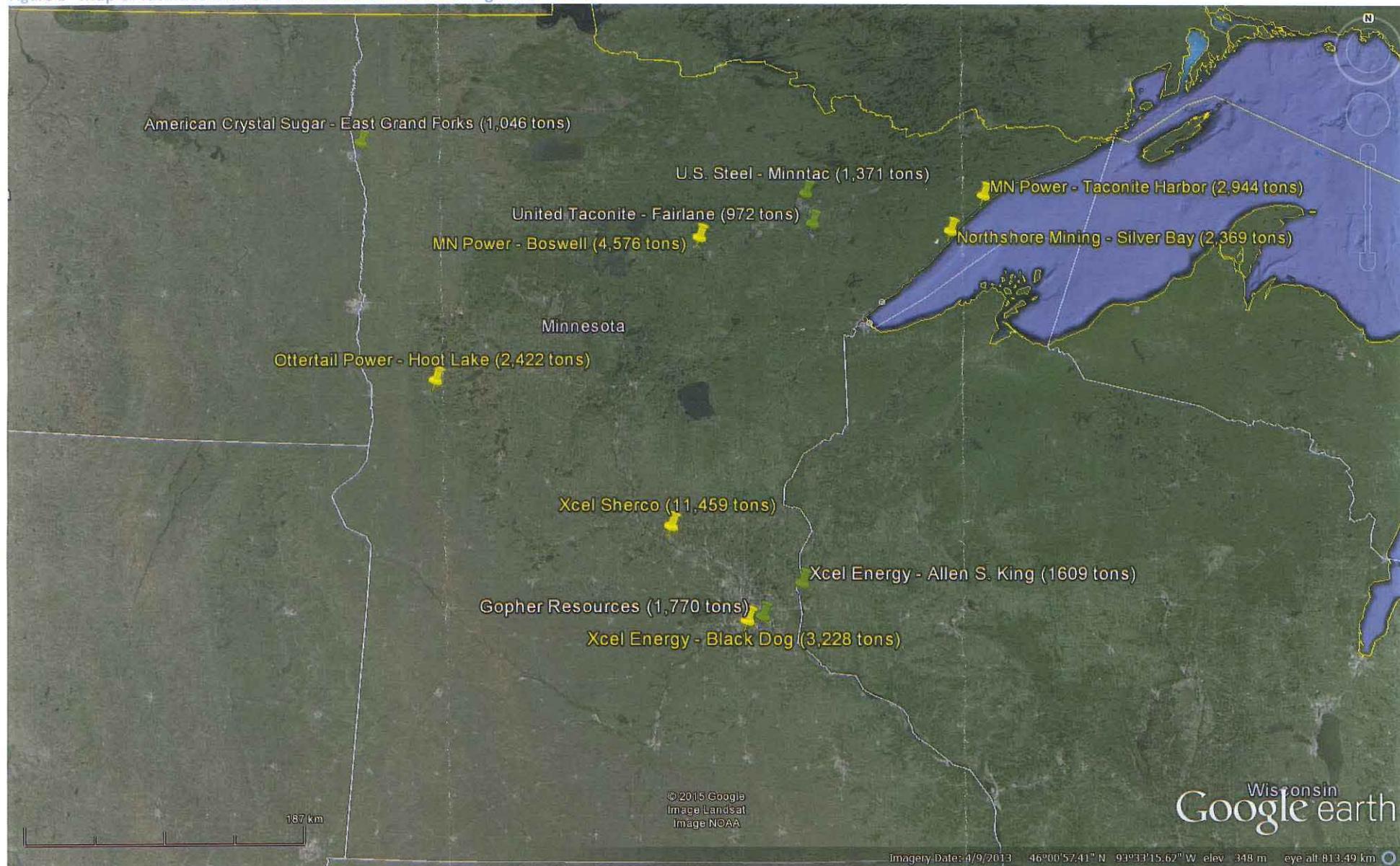


Figure 2 - Map of Xcel Black Dog and Gopher Resources

